
SDMS Doc ID 2022435

TRC

Customer-Focused Solutions

2022435

FINAL
REMEDIAL ACTION WORKPLAN (RAWP)
WASTE DISPOSAL, INC. SUPERFUND SITE
SANTA FE SPRINGS, CALIFORNIA

Prepared for

United States Environmental Protection Agency

Prepared by

TRC

On Behalf of

Waste Disposal Inc., Group (WDIG)

Approvals:

(Name) Project Coordinator Waste Disposal, Inc., Group	(Name) Project Manager TRC
(Name) Design Engineer/ Responsible Charge - Essentia	

Project No. 29022401

March 2004

TRC
21 Technology Drive
Irvine, California 92618
Telephone 949-727-9336
Facsimile 949-727-7399

PROJECT NAVIGATOR, LTD.

March 3, 2004

Project No. 98-101

VIA FEDERAL EXPRESS

Mr. Russell Mechem
U.S. Environmental Protection Agency (EPA), Region IX
75 Hawthorne Street
San Francisco, CA 94105-3901

Transmittal
Final Remedial Action Work Plan
Waste Disposal, Inc. Superfund Site
Santa Fe Springs, California

Dear Russell:

Enclosed please find two copies of the Final Remedial Action Work Plan (RAWP) for the Waste Disposal, Inc. (WDI) Superfund Site in Santa Fe Springs, California. This document is submitted pursuant to your February 27, 2004 Final RAWP approval letter.

If you have any questions or comments, please call me at (714) 388-1802.

Very Truly Yours,

Roberto Puga
WDIG Project Coordinator

Enclosures

RP:rp

cc: Jessy Fierro, DTSC
Ram Ramanujam, DTSC
Peter Janicki, CA IWMB
Joe Peel, CDM Federal
John Erwin, US Army Corp of Eng.
Greg Mellema, US Army Corp of Eng
Tom Patterson, TRC
Shelby Moore, Esq., WDIG
Mike Skinner, WDI Trustee
WDIG Member
Ken Floom, Essentia
Matt Jackson, Recon

TABLE OF CONTENTS

TABLE OF CONTENTS
(Continued)

TABLE OF CONTENTS
(Continued)

TABLE OF CONTENTS
(Continued)

TABLE OF CONTENTS
(Continued)

TABLE OF CONTENTS
(Continued)

LIST OF TABLES

LIST OF FIGURES

1.0 INTRODUCTION

1. This Remedial Action Workplan (RAWP) has been prepared to outline the activities to be performed to construct all remedy systems and components for the Remedial Action for the Waste Disposal, Inc. Superfund Site ("WDI Site" or "Site") in Santa Fe Springs, California. This RAWP was prepared in compliance with the Amended Record of Decision (AROD) (United States Environmental Protection Agency [EPA], June 2002) and Consent Decree (CD) with the associated Statement of Work (SOW) (EPA, August 2003).

2. The RAWP briefly summarizes the Remedial Action required by the CD, and focuses primarily on the construction implementation aspects of the project. The design for the Remedial Action is presented in the Final (100%) Design Report prepared by TRC (TRC, May 2003).

3. The RAWP is to be used with other management plans required by the CD and SOW. The description of the Work is contained in the SOW, Section 3.0. The scope and integration of the management plans are described in Section 1.4.

1.1 BACKGROUND

1. The WDI Site is located in Santa Fe Springs, California (Figures 1.1 and 1.2). Remediation at the Site is being performed under the oversight of the EPA, Region IX.

1.1.1 SITE DESCRIPTION

1. The Site was conceptually divided into eight areas (Areas 1 through 8) based on previous uses and conditions during the initial Remedial Investigation/Feasibility Study (RI/FS) period as shown in Figure 1.2. The Site is comprised of 22 parcels. Various businesses are currently operating on 19 of the parcels; 3 of the parcels are currently vacant. Figure 1.2 lists the parcel numbers and owners.

2. Figure 1.2 also shows current onsite and adjacent surrounding land uses. The current onsite land uses include vacant land and the following commercial/light industrial activities:
   - RV Storage
   - Wood Laminating
   - Plastics Fabrication
   - Tool and Die Work

- Machining
- Fabrication
- Heavy Equipment Rentals

3. Current adjacent/surrounding land uses include the following:
   - Private High School
   - Residential
   - Light Industrial
   - Distribution Centers
   - Utility Company Facilities
   - Office Space

4. A 42-million-gallon-capacity crude oil reservoir is buried in the central portion of Area 2. The north corner of Area 2 is covered with an asphalt parking lot and was used for recreational vehicle (RV) storage. The remaining portion of Area 2 is undeveloped. Area 1 (located along Santa Fe Springs Road) and Area 8 (located along Los Nietos Road) contain most of the light industrial complexes and small commercial businesses that are present on the Site. Areas 3 through 7 extend along Greenleaf Avenue. Areas 3 and 4 are undeveloped and are the closest property boundary to nearby residential areas (approximately 50 feet). The building located in Area 5 is used for a light industrial business. Areas 6 and 7 are unoccupied, but contain several concrete foundations that remain from previous structures.

1.1.2 SITE HISTORY

1. The reservoir was used for crude oil storage from the Santa Fe Springs oil field from 1924 to some undetermined time, probably in the 1930s. During this period, various activities were being performed outside the reservoir, including the storage and mixing of drilling muds. It is inconclusive from aerial photograph review whether waste disposal activities were being systematically carried out during this period.

2. Beginning in the late 1940s to early 1950s, the Site was used for disposal of a range of waste and solid fill materials. After 1949, waste disposal activities were regulated under permit from Los Angeles County, Department of Sanitation until facility closure in 1964. Reliable documentation on disposal was not maintained. As a result, a comprehensive history of Site disposal practices or accepted waste is not available. However, permitted waste included the following: rotary drilling muds; clean earth, rock, sand and gravel; paving fragments; concrete, brick; plaster; steel mill slag; dry mud cake from oil field sumps and acetylene sludge. Investigations have shown that disposed material also included organic wastes, oil

refinery waste, solvents, and waste chemicals. Wastes were disposed primarily within the reservoir boundary and in bermed areas surrounding the reservoir. However, field investigations and aerial photograph analyses indicates occurrence of wastes throughout most of the Site.

3. In 1953, the Site began receiving fill material to cover the Site including the reservoir area and unlined bermed disposal pits. The filling of the reservoir area continued until approximately 1966 when grading of the Site was completed.

4. The WDI Site was placed on the National Priorities List (NPL) in July of 1987. In 1988, the EPA undertook a removal action. During the years 1988 to 1993, EPA undertook an RI/FS (EPA, 1993c) which led to a selected remedy for the Site presented in the Record of Decision (ROD) (EPA, December 1993).

5. The Settling Defendants for the site (a group of Potentially Responsible Parties who carry out the requirements of the ROD under the site orders and decrees) organized the Waste Disposal, Inc. Group (WDIG). The WDIG conducted a series of predesign field investigations and treatability studies during 1995 through 2001 under Administrative Order (AO) 94-17 and Amended Administrative Order (AAO) 97-09. The results of these activities were reported in the Remedial Design Investigative Activities Summary Report (Revision 2.0) (TRC, May 2001). After incorporating comments from the EPA and California Department of Toxic Substances Control (DTSC), the report was approved in June 2001.

6. The predesign field investigations changed the conceptual model for the Site and identified additional conditions to those considered for selection of the remedy incorporated in the ROD. Therefore, a Supplemental Feasibility Study (Revision 4.0) (SFS) (TRC, March 2001) was prepared in 2001. Based on the results of the SFS, the EPA selected a revised remedy, which was incorporated in the Amended Record of Decision ([AROD], EPA, June 2002). A Remedial Design was prepared to construct the remedy presented in the AROD, and the Remedial Design Report (TRC, May 2003) was approved by EPA in June 2003.

7. During the development of the AROD, the EPA and WDIG negotiated a Consent Decree for implementation of the remedial design. The Consent Decree was entered by the United

States District Court, Control District of California on August 12, 2003. This Remedial Action Workplan is one of the deliverables required under the Consent Decree.

1.1.3 SITE CONDITIONS

1. The Site conditions are summarized in the following sections. A complete description of the objectives and findings of the Site investigations are provided in the following reports:
   - Remedial Design Investigative Activities Summary Report (Rev. 1.0) (TRC, August 1999).
   - Draft TM No. 13 Reservoir Liquids Closeout Report (TRC, August 2000).
   - Supplemental Subsurface Investigation Report of Findings (TRC, February 2001).
   - Draft 2000 Annual Monitoring Report (TRC, February 2002).
   - Draft 2001 Annual Monitoring Report (TRC, June 2002).

2. Soil borings were drilled at the WDI site for geologic logging and chemical characterization during two primary periods of investigation: the 1988 RI conducted by EPA and the 1997 Remedial Design Investigations conducted by both EPA and WDIG. Constituents detected in waste include volatile organic compounds (VOCs), primarily benzene, toluene, ethylbenzene, and xylene (BTEX); semivolatile organic compounds (SVOCs); and heavy metals such as arsenic, chromium, copper, and lead. Waste and contaminated soil have been identified throughout Area 2, which contains the buried reservoir, and portions of Areas 1, 4, 5, 6, 7, and 8 where other buried wastes have been found. Figure 1.3 presents a general cross section through the Site showing the locations and depths of the waste, reservoir fill and native materials.

3. The Remedial Design Report provides a delineation of the buried waste extent. Figure 1.2 shows the locations of the various parcels, what businesses are located on them, and the limits of the waste. Site investigations have shown that 11 of the 22 parcels have structures located over buried waste; 8 other parcels have structures, but there is no waste underlying the structure. The three unoccupied parcels have underlying waste, but no structures. The buried waste and impacted soil ranges in thickness from an average of approximately 5 to 10 feet to a maximum of 20 feet.

4. Soil gas "hot spots" are present in the subsurface (vadose zone) within and outside the reservoir (in Area 2) in several areas of the Site, including shallow fill soils, buried waste material, and deeper native soils. The "hot spots" are characterized by elevated levels

(e.g., exceeding preliminary remediation screening levels) of BTEX, methane, petroleum hydrocarbons, and chlorinated VOCs in soil gas. The primary VOC constituents detected are methane, benzene, vinyl chloride, trichloroethene (TCE), and tetrachloroethene (PCE).

5. Multiple investigations have indicated the presence of perched liquids and/or leachate both within the reservoir area (in Area 2) and at various isolated locations outside the reservoir. Liquids were encountered within the reservoir at depths ranging between 4 and 12 feet below ground (fbg). These liquids/leachate contain Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) hazardous substances, including but not limited to VOCs, such as benzene, toluene, ethylbenzene, and vinyl chloride; SVOCs; PCBs; and metals such as arsenic, chromium and lead.

6. A description of the regional ground water conditions and hydrogeology is included in the AROD. Evaluation of Site ground water data indicates that the primary VOCs detected are PCE and TCE at concentrations less than 20 µg/L. These VOCs have been detected only in the western portion of the site. Based on ground water flow conditions, the distribution of detections, and information on offsite ground water contamination sites, the sources of the PCE and TCE detected in the monitoring wells in the western portion of WDI Site appear to be from solvent releases associated with upgradient industrial Sites. Elevated concentrations of aluminum, iron, manganese, and selenium have been detected in ground water samples, in local cases above primary or secondary drinking water standards. The fact that these metals are detected uniformly across the Site suggest that the elevated concentrations reflect regional water quality conditions and are not related to onsite sources.

1.1.4 POTENTIAL FUTURE LAND USE

1. Since the issuance of the original 1993 ROD, the City of Santa Fe Springs (City) has continued to express a strong interest in redeveloping the Site for industrial uses. The City was granted a Pilot Brownsfield grant by EPA in 2000, with which they have prepared a Specific Plan for the WDI Site conforming to Section 65451 of the California Government Code. The proposed reuse is consistent with the light industrial/warehousing zoning that is currently in place at the Site. The Specific Plan has, at the time of this writing, not been formally adopted by the City.

2. The AROD (EPA, June 2002) has the expectation that the Site will be redeveloped, and therefore, there are several redevelopment related procedures, restrictions and protections

written into the Consent Decree and SOW. A form Environmental Restrictive Covenant (ERC) has been drafted that places an obligation on Site landowners to comply with redevelopment restrictions designed to protect the integrity of the remedy, and provide EPA approval authority over new construction at the Site. The ERC obligations are separate from the restrictions that may be imposed on the Site by the City's Specific Plan.

3. Developers shall comply with both the standards established by the EPA in the AROD for the WDI Site and the requirements of the Specific Plan. Table 1.1 provides a summary of the entities and responsibility that would be involved in a redevelopment project at the Site.

1.2 OBJECTIVES AND REQUIREMENTS

1. The RAWP is the primary plan to implement the remedy, including transition and assumption of work being performed at the Site under the AAO and remedial action, in order to achieve Performance Standards required by the CD. The Performance Standards include those cleanup standards, standards of control, response actions, and other substantive requirements, and criteria or limitations set forth in the Amended ROD, the CD and the SOW.

   The scope of the RAWP encompasses all activities required to complete the remedial action to the full satisfaction of the requirements of the CD. As such, the RAWP addresses all aspects of the remedial action focusing on construction including operation and maintenance, coordination with agencies, implementation of institutional controls, community relations planning, and owner's issues (redevelopment). Table 1.2 identifies the RAWP requirements, as defined by the CD and SOW (EPA, August 2003), and references where they are addressed in this plan or other management plans.

2. The objectives of the remedial action are based on the Performance Standards established in the CD and SOW. These objectives are as follows:
   - Address the Chemicals of Concern (COCs) for the Site as listed in Table 1 of the SOW and achieve Performance Standards as set forth in the Amended ROD and the SOW.
   - Comply with Applicable or Relevant and Appropriate Requirements (ARARs) identified in the Amended ROD and reproduced in Table 3 of the SOW.
   - Implement Resource Conservation and Recovery Act (RCRA)-equivalent and engineered capping systems to provide containment to

minimize the potential for exposure to buried wastes, contaminated soils and subsurface gases.

- Implement liquids and soil gas collection and extraction systems to remove and treat liquids and vapor associated with the Site.

3. The RAWP does not address nontechnical, nonconstruction Work requirements of the Consent Decree, such as:

Requirement	Consent Decree Section
• Formation of the WDIG Trust	§X.31
• Discharge of Obligations of the WDIG Trust	§X.34
- Receive, hold, manage and maintain Trust real property	§X.34a
- Comply with land/water use restrictions	§X.34b
- Provide access to Trust real property	§X.34c
- Market and sell Trust real property	§X.34d/e
- Disburse funds from Trust real property sale	§X.34f
- Monitor and enforce Environmental Restrictive Covenants	§X.34g
- Ensure protection of the remedy	§X.34h
• Notice of Project Coordinators	§XIII.54
• Assurance of Ability to Complete Work	§XIV.56
• Payments for Response Costs	§XVII
- Past response Costs	§XVII.65
- Future Response Costs	§XVII.66
• Establishment of WDI Disbursement Special Account	§XVIII
• Retention of Records	§XXVII

The WDIG Steering Committee or its designees (i.e., WDIG Trustee, WDIG Project Coordinator) will be responsible for compliance with the requirements listed above.

1.3 MANAGEMENT OF WORK COMPONENTS

1. The RAWP essentially describes the procedures for managing and implementing the Remedial Action component of the Consent Decree (see Table 1.2). There are other Work components in the Consent Decree that will be managed by the WDIG or its designees separately. There are other Work components are listed below with the responsible entity for their completion and reference for the location in the RAWP where addressed.

WORK COMPONENT	RESPONSIBLE ENTITY	RAWP REFERENCE
Transition from AAO 97-09	WDIG Project Coordinator	RAWP Appendix B.1
Operation and Maintenance	WDIG Trustee	RAWP Section 5.0
Institutional Controls	WDIG Trustee	RAWP Section 6.0
WDIG Trust Functions	WDIG Trustee	RAWP Section 1.2
Administrative Consent Decree Requirements	WDIG Project Coordinator	RAWP Section 1.2

1.4 ORGANIZATION OF RAWP AND INTEGRATION WITH OTHER SITE PLANS

1. The RAWP includes the required elements as stated in Section 5.1 of the SOW as summarized below:
   - Introduction: Explains the background, objectives and requirements of the remedial action.
   - Remedy Description: Describes the purpose and implementation of the various elements of the remedy.
   - Remedy Implementation: Defines the responsibilities for management and organization of the remedial construction and quality control objectives, including transition of the work, site management plans, construction management, procedures, deliverables, and reporting.
   - Project Schedule: A comprehensive construction schedule will be prepared by the selected construction contractor to address the overall project. The schedule would be updated monthly by the contractor.
   - Overview of Operation and Maintenance Activities: Provides a general overview and references the Operation Monitoring and Maintenance Plan.
   - Institutional Controls: Provides a general overview of the monitoring and enforcement requirements of institutional controls.
   - Site Redevelopment and Related Procedures: Provides a general overview of site redevelopment issues and references procedures in the Project Procedures Manual that specify how they will be controlled.

2. This RAWP will be implemented together with other plans required by the SOW, listed below:
   - Operation Monitoring and Maintenance Plan (OMMP)
   - Construction Quality Assurance (CQA) Plan
   - Health and Safety Plan (HASP)
   - Quality Assurance Project Plan (QAPP)
   - Sampling and Analysis Plan (SAP)
   - Institutional Controls Monitoring and Enforcement Work Plan (ICMEWP)
   - Community Relations Participation Plan (CRPP)

3. A general description of these documents and how they are integrated with the RAWP is provided in the following subsections. The anticipated completion dates for the documents is listed below:

- OMMP: 4 weeks after submission of Construction As-Built report
- CQA Plan: Approximately December 2, 2003
- HASP: Approximately November 18, 2003
- QAPP: Approximately November 30, 2003
- SAP: Approximately November 30, 2003
- ICMEWP: Approved by EPA on October 1, 2003
- CRPP: Approved by EPA on October 6, 2003

1.4.1 OPERATION MONITORING AND MAINTENANCE PLAN (OMMP)

1. The *Long-Term Ground Water Monitoring Plan, Long-Term Soil Gas and In-Business Air* Monitoring Plan, and Operations and Maintenance Plan will likely be compiled into one reference titled OMMP. The OMMP will provide the procedures and activities necessary to operate and maintain the facilities constructed during the Remedial Design implementation; and describe the monitoring programs, including locations, frequency, and parameters monitored, procedures for data management, data evaluation, reporting, inspections, contingency plans and procedures for repair or corrective action. The OMMP includes descriptions of various procedures, including:

- Procedures for verifying and documenting compliance with quality control requirements.
- Operational procedures (equipment and systems startup and shutdown, normal operational procedures, and procedures for abnormal conditions).
- Procedures of operational emergency response.
- Maintenance procedures and schedules.
- Compliance and process monitoring procedures and schedules.

1.4.2 CONSTRUCTION QUALITY ASSURANCE PLAN

1. The CQA Plan is a key management document for assuring completion of the construction work according to the design. The CQA Plan will identify steps that will be used to monitor and document the quality of materials and the condition and manner of their installation. This CQA Plan will include the following (as required by the CD):

- Identification of applicable remedial components, and a description of how they will be tested, repaired/reconditioned, retested, and accepted.
- Identification of key personnel responsible for the development and implementation of the CQA Plan and CQA Contractor qualifications.

- Detailed description of the roles and responsibilities for key personnel involved in implementation of CQA activities. The CQA Officer reports directly to the WDIG Project Coordinator and has authority to stop work in the field if necessary because of Quality Assurance issues.
- A description and basis of inspection and sampling activities for components incorporated into the remedial systems approved for the Site.
- Description of observations and tests that will be used before, during, and after construction to ensure that the construction materials and installed components meet the design specifications.
- Description of preconstruction and post construction quality assurance and control procedures for geosynthetic materials and membranes that address inspection of raw materials, manufacturing and fabrication operations, transportation, handling, storage, and adequacy of foundation preparations.
- Description of post-construction quality assurance and control procedures for geosynthetic materials and membranes that address checking for material and placement imperfections in installed materials, and implementation of material repairs for pin holes, rips, and creases.
- Acceptance and rejection criteria for construction materials; plans for implementing corrective measures; and documentation (daily reports, acceptance reports, and final) for data or other information to be recorded and retained.

2. As described in the CD, the CQA activities are primarily to verify and document that the remedy was constructed according to standards and objectives included in the approved remedial design. This will be based on quality control information gathered by the CQA Contractor as required by the plans and specifications (i.e., contractor submittals regarding material properties, testing results, etc.), inspections, and if necessary, additional independent testing. The Construction Quality Control (CQC) activities will be performed by the Supervising Contractor and by an independent contractor (e.g., for testing) as approved by the EPA, as required by the CD. The CQA data and data gathered as part of CQA activities will be provided to the CQA Contractor for review and approval. This interaction will occur as part of routine project reporting. Further details of the coordination of CQA and CQC activities will be included in the CQA Plan. The CQA Contractor will have the qualifications and experience to do the work as described in CCR Title 22, Section 66264.19.

1.4.3 HEALTH AND SAFETY PLAN

1. The HASP presents the minimum health and safety requirements and procedures that will be used during construction and operations and maintenance at the Site. The HASP will apply

to both workers at the WDI Site and public exposure to releases or spills at and from facilities and environmental control systems at the Site. The HASP addresses coordination between the various parties conducting activities at the WDI Site and emergency response agencies and personnel (e.g., police departments, fire department, and other response agencies). Contractor health and safety plans must meet the requirements of this document, but may also include additional health and safety procedures and requirements.

1.4.4 QUALITY ASSURANCE PROJECT PLAN

1. The QAPP describes quality assurance procedures and requirements for aspects of the work other than construction. This includes the laboratory procedures to be utilized, the calibration of field and laboratory equipment, quality assurance and quality control of laboratory procedures, data evaluation procedures, performance and system audits, precision and accuracy performance standards, analytical methods/control procedures, and procedures for data handling, analysis, and reporting. The QAPP also contains Standard Operating Procedures (SOPs) for performing sampling and analysis associated with the site, including sample handling and preservation.

2. The QAPP is used together with the SAP (described below) to implement the monitoring and measurement programs described in the OMMP and to assure that quality control is documented for any chemical measurements made during construction.

1.4.5 SAMPLING AND ANALYSIS PLAN

1. The SAP describes the locations and analytical parameters for sampling activities at the Site. The SAP is used with the SOPs in the QAPP to collect and analyze environmental samples at the Site.

1.4.6 INSTITUTIONAL CONTROLS MONITORING AND ENFORCEMENT WORKPLAN

1. The ICMEWP describes the objectives of and procedures for the monitoring and enforcement of Institutional Controls (ICS) established by Section IX and X of the CD, and Section 3.13 of the SOW. The ICMEWP includes the following components:
   - Description of individual properties and uses on the WDI Site.
   - Description of the ERCs to be implemented on the properties.
   - Description of the monitoring activities to be performed by the Settling Defendants.

- Description of potential enforcement mechanisms to be used in instances of noncompliance with the ICS.

2. The Final ICMEWP was approved by EPA on October 1, 2003. It is the responsibility of the WDIG Trustee to implement the ICMEWP.

1.4.7 COMMUNITY RELATIONS PARTICIPATION PLAN

1. The CRPP describes the Settling Defendant's involvement in EPA's community relations activities. The plan includes the following components:
   - Stereotypes for dealing with the public/community in connection with remedial activities.
   - Information dissemination strategies and procedures.
   - Public relations related coordination procedures for EPA and other agencies.

2. The Final CRPP was approved by EPA on October 6, 2003. It is the responsibility of the WDIG Project Coordinator to implement the CRPP .

2.0 REMEDY DESCRIPTION

1. The remedy described in the AROD consists of a RCRA-equivalent cap over the reservoir and several other engineered capping systems beyond the reservoir. Gas collection and extraction control systems will be installed to treat soil from beneath the capped areas in the reservoir area. Passive gas migration control systems (e.g., bioventing wells) or active gas extraction control systems (soil vapor extraction control systems) will be installed outside of the reservoir in Area 2. In-business air will be monitored to ensure protectiveness of the gas migration or gas extraction components. A liquids collection system will be installed to collect leachate and free liquids from within the reservoir boundary. Institutional Controls will be implemented to prevent exposure to waste and to protect the integrity of the remedy components. The remedy also includes long-term overview of operations and maintenance (O&M) of all environmental control systems associated with the Site to ensure that all systems are functioning effectively and to control access to the Site. The following sections describe the purpose and implementation of the various elements of the remedy and Figure 2.1 shows major remedy component locations.

2.1 RCRA SUBTITLE C-EQUIVALENT COVER

1. The remedy in the AROD incorporates a RCRA Subtitle C-equivalent cap in the area of the reservoir. A blanket gas extraction control system is required underneath the RCRA Subtitle C-equivalent cover. The gas extraction control system design is discussed in Section 2.4. RCRA Subtitle D-equivalent cover systems are contiguous with the area of the Subtitle C-equivalent cover and share some facilities to be constructed (i.e., the anchor trench). The Subtitle D-equivalent covers are discussed in the following section. This section describes the general design and description of the containment portion of the RCRA Subtitle C-equivalent cap over the reservoir area. Figure 2.2 shows the design for the RCRA Subtitle C-Cover system.

2.1.1 KEY PERFORMANCE STANDARDS

1. Key performance standards for the RCRA Subtitle C-equivalent cover include the following:
   - Include an existing soil cover/foundation layer that is capable of sustaining loads due to cover construction so as not to preclude an appropriately-designed pavement structural section for parking by a future end user.

- The cover is to include a composite low hydraulic conductivity layer below a geomembrane (barrier layer).
- Resist infiltration equivalent to a geomembrane over a 2-foot-thick soil layer with a hydraulic conductivity of 1E-07 centimeter per second (cm/sec) or less and less than a bottom liner.
- Provide a water drainage layer above the barrier layer.
- Provide a filter layer above the drainage layer to prevent clogging.
- Include an overlying vegetative layer thick enough to:
  - Protect the barrier layer
  - Support vegetation
  - Prevent erosion from damaging cover
  - Prevent root penetration into the filter layer
- Accommodate settlement to maintain cover integrity and drainage.
- Construct surface grades sufficient to prevent ponding or surface run-on.

2.1.2 DESCRIPTION

1. The proposed RCRA Subtitle C-equivalent cover includes (from top to bottom):
   - Minimum 2 feet of soil compacted to 90 percent relative maximum density as the erosion protection/vegetation layer. Site soils will be used as this fill layer.
   - A geocomposite drain layer.
   - A 60-mil high density polyethylene (HDPE) barrier layer.
   - A GCL secondary barrier layer (reinforced and needle punched).
   - A geocomposite gas collection layer (discussed in Section 2.4).
   - A foundation layer constructed of soil and/or waste.

2. Other key engineering details include the following:
   - The surface will be graded at a slope of 2 to 3 percent to provide drainage.
   - A contingency foundation layer 1-foot thick or more placed in areas exhibiting potential bearing capacity failure during construction or exposed waste.

3. The RCRA Subtitle C-equivalent cap will cover the reservoir area as shown in Sheet 9 of the Drawings. There is an anchor trench around the perimeter of the RCRA Subtitle C-equivalent cover that will also act as an anchor trench for geosynthetic portions of the RCRA Subtitle D-equivalent Geosynthetic Clay Layer (GCL) cover described in Section 2.2. The anchor trench will also contain a french drain to convey infiltration collected in the geocomposite drain layer to a discharge location. The RCRA

Subtitle C-equivalent cover has been designed to virtually eliminate infiltration of surface water into waste within the reservoir and also promote drainage, minimize erosion, accommodate settling and subsidence, function with a minimum of maintenance, and allow redevelopment.

4. Construction of the RCRA Subtitle C-equivalent cap will likely be the last in the sequence of capping activities planned for the Site. This is because any waste that is encountered during construction of caps in other areas will be reconsolidated under the RCRA Subtitle C-equivalent cap.

5. Construction will begin with the clearing and grubbing of areas where the cover will be placed. This includes demolition of the asphalt paving in the area of the existing RV storage lot. Debris resulting from the clearing and grubbing will be stockpiled in an unused area of the Site before offsite disposal, salvage or potential burial in onsite areas.

6. While the area is being cleared, excavation to greater than 2 feet below the proposed final grade will commence. The thickness of the cover components above the foundation is approximately 2.1 feet. In addition, some densification is expected to occur as part of the preparation of the foundation and placement of the compacted soil erosion protection layer. Densification due to compaction would result in the excavated soil filling a smaller volume than the volume of the excavation. Therefore, excavation to a minimum of approximately 2.5 feet is recommended. Deeper excavation may be necessary to remove oversize material and debris.

7. The excavated soil will be stockpiled onsite. Stockpile management procedures are described in Section 2.1.2.1 below. During stockpiling, debris, rubble and large oversize material will be removed from the excavated soils to make the soils suitable for use as backfill. The debris, rubble, and large oversize materials will be managed with the debris from the clearing and grubbing activities. The excavated soils will be tested on a selected frequency (i.e., every 500 cubic yards) for indication of the presence of waste. The parameters to be monitored include organic vapors, visual appearance, and consistency (as measured in situ with a pocket penetrometer). These procedures are documented in the Final Remedial Design Report (TRC, May 2003).

8. If waste is encountered during excavation or foundation preparation, the waste requiring excavation will be reconsolidated in the designated area of the reservoir shown in Sheet 7 of the Drawings.

9. The Supervising Contractor is required to prepare a Waste Materials Disposal Plan (WMDP), which includes procedures for management and disposal of any waste encountered, including for example, temporary staging on a geomembrane if necessary. The WMDP is included in Appendix B.5. If free liquids are encountered during excavation, the free liquids must be removed (i.e., collected in an appropriate container or stabilized using soil or other granular material before disposal). The procedures for management and disposal of any free liquids encountered will also be included in the WMDP.

10. The foundation will be prepared using in-place materials. The bottom of the excavation will be ripped or scarified, debris and rubble removed, and then the scarified soil will be recompacted. Recompaction will be to 90 percent of maximum dry density. The foundation grade will slope a minimum of 1 percent, with most areas sloping 2 percent toward the perimeter anchor trench to facilitate collection of drainage in the anchor trench.

11. In areas where waste or soft materials are encountered, a contingency foundation layer consisting of a geogrid and aggregate may be required. The function of the contingency foundation layer is to provide a suitable structural base to allow construction of the cover and to mitigate potential structural soft spots in the cap. The contingency foundation layer is shown as Section A in Sheet 8 of the Drawings.

12. Once the foundation is prepared, the gas collection system elements that underlie the containment elements of the cover will be installed. This includes gravel filled trenches with piping and the lower geocomposite layer. A description of the purpose and construction of the gas collection system is included in Section 2.4.

13. The GCL, HDPE, and geocomposite drainage layers of the cover are placed on top of the gas collection system geocomposite using normal construction methods as described in the Specifications, and these three layers are anchored in a perimeter anchor trench. As mentioned above, the anchor trench also anchors the GCL component of the RCRA Subtitle D-equivalent cover outside the reservoir and is finished as a gravel-filled french drain with perforated PVC pipe to convey infiltration collected by the drainage layer. It is assumed that the RCRA Subtitle D-equivalent cover will be completed up to the trench

location prior to initiating construction of the Subtitle C-equivalent cover, and that the GCL for the RCRA Subtitle D-equivalent cover will be anchored afterward (i.e., during construction of the Subtitle C-equivalent cover).

14. The anchor trench will be sloped to drain from a high point in the northeast edge of the cover area to a low point in the western edge of the cover. The drainage is conveyed by a pipe to a surface outlet and ultimately flows to Santa Fe Springs road. The drainage pipe should be installed during preparation of the foundation of the RCRA Subtitle D-equivalent cover.

15. Penetrations through the RCRA Subtitle C-equivalent cap will be required for the leachate collection points (see Section 2.5). Other penetrations may also be necessary (i.e., for monitoring wells and possibly other piping). Such penetrations will be protected by an HDPE boot, as shown in Detail 7 of Sheet 13 of the Drawings.

16. The 2-foot soil erosion protection layer will be placed as described in the Specifications. Additional fill (imported as necessary) will be placed to achieve the final grades. The 2-foot soil layer will be compacted to 90 percent of maximum dry density.

17. Once the RCRA Subtitle C-equivalent cover is completed and the aboveground components of the gas collection system are constructed, the final Site grading will be performed (assuming that the RCRA Subtitle D-equivalent cover construction is completed earlier). The grading is designed to minimize soil excavation adjacent to adjoining properties and minimize changes to existing drainage patterns. The Site was regraded in 1998 (TRC, December 1998) to reduce the potential for surface water infiltration in the soil-covered areas, reduce the potential for flooding of nearby businesses, and provide final management of investigation derived wastes and miscellaneous debris generated during EPA and WDIG field activities. The 1998 Site regrading was performed in general conformance with the 1996 Prefinal (90%) Design (TRC, April 1996). Hence, the existing topography over much of the Site is close to the design topography of the RCRA Subtitle C- and D-equivalent covers. The surface water management systems are discussed in Section 2.3.

18. A single-lane access road with a turnaround will be provided to allow access from public streets to monitoring points located in the RCRA Subtitle C-equivalent and Subtitle D-equivalent GCL cover areas (discussed in Section 2.2). The roads will also provide access to the gas treatment system and vent.

19. The final step in completing the cap is revegetation. Revegetation of the cover areas is discussed in Section 2.7.

2.1.2.1 Stockpile Management

1. As discussed in the Design Report, the RCRA D covers will be constructed first to leave the RCRA C cover area available to place contaminated soil and waste encountered and removed from the RCRA D areas. Management of any waste material excavated during cap construction is described in the Waste Materials Disposal Plan (Appendix B.5). Sheet 7 of the Design Plans shows the proposed locations of the waste reconsolidation areas. If the suspected contaminated soil cannot be placed in the reconsolidation area immediately, it will be stockpiled in the RCRA C cover area until it can be placed. The exact locations of the stockpiles will depend on the site conditions and access requirements at the time the stockpile is needed. The following guidelines will be used for stockpiles placement:
   - Soil will not be stockpiled within 50 feet of adjacent property boundary.
   - Stockpiles will be no higher than 4 feet in areas where cover is completed.
   - Suspected contaminated soils will have a 40-mil liner underneath them.
   - Stockpiles will be covered during rain and otherwise protected from erosion.
   - Stockpiles will be regularly wetted to minimize dust.

2. The proposed stockpile protections, construction sequencing, locations shall be discussed with EPA's onsite oversight representative prior to stockpile placement.

2.2 SUBTITLE D ENGINEERED EQUIVALENT COVER SYSTEMS

1. The AROD requires RCRA Subtitle D-equivalent caps in areas outside the reservoir area that are underlain by waste materials. Three different cover systems are described for these areas in the AROD: an engineered soil capping system (GCL cover), asphalt, and concrete. The engineered soil capping system would be used in areas outside the reservoir where there is no existing asphalt or concrete paving at the Site. The engineered soil capping system incorporates a GCL cover with 2 feet of overlying vegetation layer soil. The following sections discuss the general design and description of the three different cover systems.

2.2.1 KEY PERFORMANCE STANDARDS

1. The Subtitle D engineered equivalent covers are to perform in accordance with the following:
   - A foundation layer of 2 feet or more having appropriate engineering properties to support the cover (e.g., bearing capacity sufficient to support the cover and construction related traffic).
   - Low hydraulic conductivity layer with infiltration equivalent to a minimum 1-foot thickness of soil with a hydraulic conductivity of 1.0E-06 cm/sec or less.
   - Vegetative/erosion resistant layer thick enough to:
     - Support vegetation (for soil based cover)
     - Resist erosion
   - Vegetation with a root depth less than vegetative soil layer thickness (for soil based cover).
   - Cover sloped to provide run-off of precipitation and prevent ponding and soil erosion.

2.2.2 DESCRIPTION OF THE GCL COVER

1. The GCL cover includes (from bottom to top) a prepared foundation subgrade, a GCL layer, a geotextile cushion layer, and 2 feet of vegetation layer soil for erosion resistance. It will cover nonreservoir areas of the Site that are underlain by buried waste materials and currently have a soil cover, as shown in Sheet 3 of the Drawings. The GCL cover has been designed to minimize infiltration of surface water, promote drainage, minimize erosion, accommodate settling and subsidence, and function with minimum maintenance. It will utilize existing fill soils at the Site.

2. It is assumed that the Subtitle D-equivalent covers will be constructed prior to construction of the Subtitle C-equivalent cover described in Section 2.1. This will allow consolidation of waste encountered during construction into areas within the reservoir. However, the drain pipe for the anchor trench of the Subtitle C-equivalent cap should be installed prior to construction of the GCL cover to eliminate the need for excavation and GCL cover replacement later. In addition, the underground electrical conduit for the gas treatment system should be installed prior to construction of the GCL cover.

3. Construction of the GCL cover will begin with clearing and grubbing the areas where the cover will be placed. This includes demolition of several existing concrete foundations, some areas of asphalt paving (i.e., the RV storage lot), and some derelict structures. Debris

resulting from the clearing and grubbing will be stockpiled in an unused area of the Site before disposal offsite, salvage, or potential burial in onsite areas.

4. Also during the early Site preparation stage of the work, containerized waste must also be removed. The containerized waste includes drums of materials abandoned by a former property owner and located on the Campbell property, and drummed investigation waste located approximately in the southern corner of Area 2. It is anticipated that the drums on the Campbell property will be overpacked and hauled away to an appropriate disposal facility. The investigation wastes (drums of ground water and soil cuttings) can likely be disposed at the Site (i.e., the ground water discharged and the soil cuttings consolidated under the covers). Procedures for the management and/or disposal of containerized and investigation wastes will be covered in the WMDP prepared by the Supervising Contractor.

5. While the area is being cleared, excavation to at least 2 feet below the proposed final grade will commence. The final grade is shown on Sheet 7 of the Drawings. The thickness of the cover components above the foundation is approximately 2.0 feet. However, some densification is expected to occur as part of the preparation of the foundation and placement of the compacted soil erosion protection layer. Densification due to compaction would result in the excavated soil filling a smaller volume than the volume of the excavation. Therefore, excavation to a minimum of approximately 2.5 feet is recommended. Deeper excavation may be required if oversized or unacceptable materials are encountered.

6. Excavated soil will be stockpiled onsite. During stockpiling, debris, rubble and large oversize material will be removed from the excavated soils to make the soils suitable for use as backfill. The debris, rubble and large materials will be managed with the debris from the clearing and grubbing. If waste is encountered during excavation or foundation preparation (described below), the waste will be reconsolidated into one of two areas indicated in Sheet 7 of the Drawings. If liquids are encountered during excavation, the liquids must be removed (i.e., either by pumping into a suitable container or by stabilization with soil or other granular material) prior to offsite disposal. Procedures for managing waste and liquids will be included in the WMDP.

7. The foundation will be prepared using the in-place materials. The bottom of the excavation will be ripped or scarified, structural debris and rubble removed, and then the scarified soil will be recompacted. Recompaction will be 90 percent of maximum dry density.

8. In areas where soft materials are encountered, a contingency foundation layer consisting of a geogrid and aggregate will be constructed. The function of the contingency foundation layer is to provide a suitable structural base to allow construction of the cover and to mitigate potential soft spots in the cap. The contingency foundation layer is shown as Section A in Sheet 8 of the Drawings.

9. The GCL will be placed on the foundation using normal construction methods as described in the Specifications; and the geotextile will be placed over the GCL prior to placing the 2-foot soil erosion protection layer. Transitions to other cover types at the Site (i.e., the Subtitle C-equivalent; asphalt and concrete covers) are shown in Sheet 10 of the Drawings. Penetrations in the GCL and geotextile that are necessary to allow for piping, wells, etc. will be protected with a HDPE boot, as shown in Detail 7 of Sheet 13 of the Drawings.

10. The 2-foot soil erosion protection layer will be placed as described in the Specifications. Additional fill (imported as necessary) will be placed to achieve the final grade. Once construction at the Site is complete, surface water management features will be constructed as described in Section 2.3 and the surface will be revegetated as described in Section 2.7.

2.2.3 DESCRIPTION OF THE ASPHALT COVER

1. The surface of some areas of the Site that are underlain by buried waste (Areas 1, 5 and 8) is currently covered by asphalt pavement. These paved areas are parking lots and roads associated with the active businesses on some of the properties that make up the Site. In these areas, asphalt pavement will be used as an Engineered Cover. The areas where asphalt will be the cover are shown in Sheet 9 of the Drawings. An evaluation of the existing asphalt was conducted to determine areas where the asphalt pavement needs to be removed and replaced in order to function as a Subtitle D-equivalent cover, and other areas where an overlay of asphalt is appropriate.

2. The asphalt and concrete cover areas (described below) will likely be constructed concurrently with the Subtitle C and GCL covers. The work will begin with the Contractor meeting with the tenants/owners of each property to discuss logistics, potential business interruptions, coordination, and schedule. The Contractor will then prepare a plan and schedule for performing the work, and implement the plan.

3. The Specifications for the asphalt mix are provided in Appendix I of the Final 100% Design Report (TRC, May 2003). The asphalt specification is a performance specification to assure that the hydraulic conductivity is less than or equal to that required for Subtitle D-equivalence, and to assure that the paved areas can withstand the existing traffic loads without excessive maintenance. Review by the engineer indicates that performance specifications can generally be met using a high-density, low-voids ratio mix (98 percent of maximum density and 2 percent air voids) with a well-graded aggregate. Alternatively, a mix that includes binder modifiers, such as Matcon™ and an appropriate aggregate can be used to meet equivalent durability and permeability requirements. The selected paving contractor must provide a mix design that meets the performance requirements, and must provide test results that are acceptable to the CQA Engineer.

4. The asphalt paving will require coordination with the property owners and tenants. The first step in paving will require temporary removal of equipment, vehicles and other items in the area to be repaved by the owners. For the areas where removal and replacement will occur, the existing paving would be removed and disposed by the qualified paving subcontractor, then the subgrade would be prepared for the aggregate base course underlying the asphalt concrete course. The prepared subgrade would be graded to match or improve existing surface drainage.

5. As with the GCL cover, any waste which needs to be removed to facilitate paving would be reconsolidated in designated onsite areas, and as determined by the contractor soft areas would be reinforced with geogrid and aggregate when necessary. The subgrade represents the foundation, which must be structurally competent to support the asphalt to minimize the potential for rutting and cracking of the asphalt and other occurrences that would increase maintenance.

6. For areas with an overlay, the qualified paving subcontractor would prepare the current surface for an asphalt overlay using normal pavement construction methods. This includes cleaning the existing pavement surface and milling the pavement down in areas adjacent to existing structures (i.e., concrete drainage swales, building foundations, curbs and sidewalks, etc.). After preparation, the overlay would be placed according to the Drawings and Specifications.

7. The pavement sections are shown in Details 6 and 6A of Sheet 10 of the Drawings. As indicated, the structural section (to be used in areas where existing pavement is removed and replaced) includes a 4-inch course of asphalt concrete over a 7-inch layer of aggregate base. The overlay course includes a 2-inch course of asphalt concrete over a nonwoven geotextile bound to the surface prepared with asphalt binder.

8. Appendix B.1 - Site Coordination Plan addresses the coordination steps that will be performed with the onsite owners/tenants. These steps generally include the following:
   - Preparation of Parcel-Specific Plans, which summarize the parcel specifics, the scope and remedial activities to be performed, special logistical concerns, projected schedules, and particular agreements between the WDIG and owner/tenants.
   - A series of one-on-one meetings between EPA, WDIG and the owner/tenants.
   - Postconstruction briefings with owner/tenants to discuss long-term access and O&M requirements.

2.2.4 DESCRIPTION OF THE CONCRETE COVER

1. The surface of some areas of the Site that are underlain by buried waste (Areas 1, 5 and 8) is currently covered by concrete pavement or building floor slabs. These concrete-paved areas are associated with the current active businesses on the properties that make up the Site. In these areas the existing concrete pavement/floor slabs will be used as an Engineered Concrete Cover. The existing concrete pavement/floor slabs (after being rehabilitated where necessary) are capable of providing performance equal to or better than the prescriptive Title 27 cover relative to water infiltration.

2. The areas of concrete cover are shown on Sheet 9 of the Drawings. As shown, the areas of concrete cover are more limited than the asphalt cover areas, and there is only one area where the concrete will be replaced. The decision to repair or replace the existing concrete was based on visual assessment by an Engineer of the various surfaces. In areas where cracks were observed, but the pavement was still structurally intact, repair (by filling the cracks with joint sealant) was designated. In the one area where existing concrete pavement was severely broken and cracked, replacement was designated.

3. Concrete repair and replacement will also need to be coordinated with the various property owners and tenants. The areas to be repaired or repaved will need to be temporarily cleared, and the Contractor will prepare the area (i.e., by cleaning out the cracks and adjacent surfaces

for the areas to be repaired or by cutting and removing the concrete in the area where replacement will occur), then perform the designated repair or replacement. Normal construction methods will be used for this work by a qualified subcontractor.

4. Since the concrete pavements/floor slabs will be accessible, direct visual observation of the Engineered Concrete Cover integrity can be made during the postclosure operation and maintenance period. If cracking is observed, the areas will be repaired by patching, sealing or other acceptable means. The Engineered Concrete Cover will be maintained in a condition such that percolation is minimized. If postclosure land uses change, the pavement will either be replaced by a suitable equivalent barrier or maintained in a condition that will minimize percolation.

5. The concrete structural section and methods of repair are shown in Details 7 and 7A on Sheet 10 of the Drawings, and in the Specifications. The cracks and joints will be filled with commercially available grout seal according to the manufacturer's instructions. The replacement concrete section includes 7.5 inches of concrete over 4 inches of crushed miscellaneous base.

6. Appendix B.1 – Site Coordination Plan addresses the coordination steps that will be performed with the onsite owner/tenants.

2.3 SURFACE DRAINAGE CONTROL SYSTEM

1. The objective of the surface drainage control system is to promote drainage utilizing existing watersheds to the maximum extent possible, and to protect existing facilities and operations at the site from excessive erosion. The drainage system is illustrated in Sheets 7 and 15 of the Drawings.

2.3.1 KEY PERFORMANCE STANDARDS

1. Key performance standards for the surface drainage control system include the following:
   - Prevent erosion of containment structure.
   - Design system for 100-year, 24-hour storm.
   - Integrate with existing offsite infrastructure.
   - Final grade to promote lateral drainage and prevent ponding due to future settlement.
   - Final grade to consider postclosure land use.

2.3.2 DESCRIPTION

1. The Site was regraded in 1998 (TRC, December 1998) to reduce the potential for surface water infiltration in the soil covered areas, reduce the potential for flooding of nearby businesses, and provide final management of investigation derived wastes and miscellaneous debris generated during EPA and WDIG field activities. The 1998 Site regrading was performed in general conformance with the 1996 Prefinal (90%) Design Report (TRC, April 1996).

2. As illustrated in Sheet 7 of the Drawings, surface water run-off control activities at the perimeter consist of berms and swales, as well as a precast concrete catch basin near the northeast corner of the Site. This catch basin will convey stormwater to an existing storm drain catch basin at the curb along Greenleaf Avenue. An application for a permit to perform this tie-in will be submitted to the Los Angeles County Department of Public Works (LACDPW). Except for the catch basin, the surface drainage system is similar to drainage provisions constructed during the 1998 regrading of the Site. Recent inspections of the Site have found no erosion of the ground surface in the regraded areas and there have been no problems (e.g., excessive sediment or flooding) with drainage of surface run-off to the storm drain system in the adjacent streets.

3. The infiltration through the vegetation layer of the RCRA Subtitle C-equivalent cap over the reservoir is collected in a french drain installed in the anchor trench for the synthetic components of the cap (see Sections B and C of Sheet 10 of the Drawings). Water collected in the french drain will be conveyed by a pipe to the driveway of an adjacent facility as shown in Sheet 7 of the Drawings.

4. The water collecting in the french drain is considered uncontaminated infiltration as it will have only contacted the clean fill in the vegetation layer. The Stormwater Pollution Prevention Plan (SWPPP) (Appendix B.6) addresses monitoring of this drain water. However, it may be considered a point source discharge that could be subject to National Pollutant Discharge Elimination System (NPDES) requirements.

5. The stormwater and surface drainage controls will be constructed during final grading of the surface of the Subtitle C and GCL covers.

2.4 GAS MIGRATION CONTROL SYSTEM

1. The gas control systems consist of the following elements:
   - Reservoir Gas Collection System: Inclusion of a gas collection layer beneath the containment portion of the RCRA Subtitle C-Equivalent Cap. The gas collection system will initially be an active system, venting through a vertical pipe within a fenced area at the high point of the cap. Provisions have been made for treating collected gas using vapor-phase granular activated carbon (VPGAC). Extracted gas will be treated to meet a maximum emission of 1 lbs/day of VOCs. The gas collection system will also be monitored for methane, and if the methane emission rate drops to less than 2.3 lbs/day[1] after the first year of operation of the system, it will be converted to a passive system.
   - Building Modifications: Existing buildings will be inspected and cracks and penetrations in the floor slabs filled. Indoor air quality of existing buildings that are underlain by buried waste will continue to be monitored. If this monitoring shows gas concentrations above health protective levels, additional engineering modifications of the building may be installed. Collected gas will be vented untreated unless it exceeds one pound per day of VOCs. Provisions have been made for treating vented gas using vapor-phase granular activated carbon, if necessary.
   - Sentinel Biovent System (Section 10.3): The sentinel biovent system is a secondary gas control system for the Site. A soil aeration system consisting of passive sentinel biovent wells will be placed around areas outside the reservoir where exceedances of Soil Gas Performance Standards have occurred to reduce formation and migration of methane gas.

2.4.1 KEY PERFORMANCE STANDARDS

1. Key performance standards for the gas migration control system include:
   - Prevent migration of contaminated soil gas.
   - Design for the maximum expected gas flow rate from the entire area of the reservoir.
   - No discharge of air contaminants which cause injury, detriment, nuisance or annoyance.
   - Reduce nonmethane organic carbon (NMOC) by at least 98 percent by weight or reduce outlet NMOC concentration to less than 20 ppmv dry basis as hexane at 3 percent oxygen.
   - If methane emission rate is less than 2.3 pounds per day after the first year of operation of the gas collection system, it will be converted to a passive system.
   - Extracted gas will be treated for at least the first year.
   - Methane concentration maintained at or below 1.25 percent by volume in air within buildings.

---

[1] 2.3 lbs/day is the estimated methane emission rate under existing conditions (TRC, March 1999).

- Maintained health protective concentrations of soil gas within buildings.
- Maintain Soil Gas Performance Standards (presented in the AROD) in soil gas at the Site boundary.

2.4.2 RESERVOIR GAS COLLECTION SYSTEM

1. The reservoir gas collection system consists of:
   - A single-sided geocomposite (geonet with geotextile bonded to the bottom side) blanket under the Subtitle C-equivalent cover in the reservoir area (described in Section 2.1).
   - Eight 2-inch-diameter perforated PVC conveyance pipes in gravel-lined trenches to facilitate movement of the gas from the perimeter of the reservoir to the central venting system.
   - A central vent system located at the high point of the reservoir cover. The central vent system consists of a concrete pad with a vertical PVC venting stack, a blower, and the gas treatment system.

   These components of the gas vent system are shown in Sheets 7, 10, and 11 of the Drawings.

2. As shown in the Drawings, the single-sided geocomposite will extend to within 5 feet of the inside edge of the top of the reservoir berm and be anchored into the subgrade. The underlying gas collection piping configuration is adequate to convey the expected gas emissions with a large factor-of-safety. The collector pipes will be surrounded by a bedding material to support them and assure they will not be crushed during placement of overlying materials.

3. The gas vent pipe will be fitted with an electric-powered blower to induce a negative pressure on the gas collection system. Further, VPGAC vessels will be connected to the blower for treatment of the extracted gas to maintain emissions below 1 pound per day of VOCs. The VPGAC vessel outlet will be connected to the vertical vent pipe. The vent stack, blower, and gas treatment system will be mounted on a concrete slab within a fenced compound. If monitoring (i.e., during system startup or during the first year) indicates the need, supplementary treatment systems (i.e., to treat methane) could be added, as there is sufficient room in the vent area to place additional equipment. The additional gas treatment systems would be installed during the startup phase, or later, as necessary.

2.4.3 BUILDING MODIFICATIONS

1. Some of the existing buildings on the Site are constructed over buried waste and in areas of noncompliance with Soil Gas Performance Standards. Although in-business air monitoring has shown few exceedances of the EPA interim threshold levels (ITLs) and the exceedances observed have been attributable to operations of the tenants occupying the buildings, contingency modifications and retrofit activities have been included in the design to mitigate the potential for soil gas migrating into these buildings.

2. Sealing of penetrations and cracks in the foundations of existing building will be performed as a preventative measure as part of remedial construction. The procedure includes inspection and building plan review of each building foundation by the contractor and development of a plan that describes where the foundation improvements would be performed, how the cracks would be filled, and how the improvements are documented. The plan would be approved by the Design Engineer and implemented by the contractor. The work is expected to generally consist of sealing identified cracks and penetrations with concrete joint sealant or boots around floor slab penetrations as described in the Specifications. It is likely that this work would be performed concurrently with the construction of the asphalt and concrete paving work.

3. The indoor air of the buildings would continue to be monitored during the postclosure operation and maintenance period. The monitoring will be used for future decision-making regarding modifications to the building. Example decision trees for determining if additional engineering controls are required are provided in Figures 2.3 and 2.4. These example decision trees have been used as the design basis for the building modification program. The final decision trees will be included in the OMMP.

4. If future monitoring indicates that additional controls are necessary (per a decision criteria matrix such as in Figures 2.3 and 2.4), an engineer will determine which engineering control(s) should be implemented. Sheet 11 of the Design Plans includes designs for a contingency foundation vent system to intercept vapors below the building foundation and vent them above the building roof. The designs will be submitted to the EPA and the EPA will determine if approval is required. The designs would be installed following review and/or approval.

2.4.4 SENTINEL BIOVENT SYSTEM

1. The Sentinel Biovent System is a secondary gas control system for the Site. It is a cost effective means to monitor the effectiveness of passive remediation, and as an enhancement to natural degradation around the edges of areas of noncompliance with Soil Gas Performance Standards. Since it is a secondary system, there are no specific performance goals other than to supplement the primary gas control systems (i.e., the reservoir gas collection system and the engineering controls on buildings).

2. The Sentinel biovent system will be installed as follows:
   - Sentinel Biovent Wells will be installed at the locations shown in Sheet 12 of the Drawings.
   - Wells will be constructed and screened at the selected zones or depths (indicated in Sheet 13 of the Drawings), which are based on vapor well and boring log data.
   - Wells will be equipped with atmospheric pressure vents and inlets (BaroBall valves or equivalent) that will allow the following operations:
     - As atmospheric pressure increases, oxygen (air) will flow into the well.
     - As atmospheric pressure decreases, the valve will close and the air in the well will be pulled into the formation.
   - After installation of the biovent wells, the well head pad will be constructed.
   - The effectiveness of the Bioventing System will be described in the Long-term Soil Gas Monitoring Plan as part of the OMMP.

3. The installation of the sentinel biovent wells will likely occur after construction of the GCL, asphalt and concrete covers (see Section 2.2). The design includes measures for penetration of the covers, as shown in Sheet 11 of the Drawings.

2.5 LEACHATE MONITORING/CONTROL SYSTEM

1. The Leachate Monitoring/Control System consists of four collection points installed within the limits of the reservoir. The wells will be used to monitor for the accumulation of liquids on the reservoir bottom. If the liquid level reaches a depth of 12 inches from the bottom of any well installed to the bottom of the reservoir, the liquids will be pumped out and disposed offsite. Procedures for monitoring and removal of liquids in the reservoir area will be described in the OMMP.

2. Four Leachate Collection Points (LCPs) will be installed within the boundary of the reservoir to monitor free liquids within the zone immediately above the concrete bottom of the reservoir. The design of the LCPs is shown in Sheet 13 of the Design Plans. Each LCP will be a well drilled to the concrete bottom of the reservoir with a screened interval 2 feet in length at the bottom. The LCPs will likely be installed concurrently with the biovent wells.

2.6 MONITORING SYSTEMS

1. There are existing monitoring systems for soil gas (vapor wells), ground water, in-business air, and stormwater. New systems to monitor gas collection system emissions, and settlements are being provided. The monitoring systems for soil gas are being used to determine compliance with Soil Gas Performance Standards. Monitoring systems and outlines for the monitoring plans are discussed below. Detailed monitoring plans for all monitoring programs will be presented in the OMMP for the closed Site.

2.6.1 KEY PERFORMANCE STANDARDS

1. The monitoring systems must be capable of providing representative samples of in situ conditions for soil gas and ground water.

2.6.2 DESCRIPTION

1. Soil gas monitoring is an integral component of the soil gas remedy. Ground water monitoring has been selected in the AROD as the remedy for ground water. Soil gas and ground water monitoring will be conducted to assure current conditions are maintained and that the remedy is performing properly. A subset of the current networks of soil gas and ground water monitoring points will be used to fulfill performance-monitoring requirements. Changes to the existing monitoring network and program will be implemented after EPA approval. The proposed locations of the soil gas and ground water monitoring points are shown in Sheet 12 of the Drawings. Existing soil gas and ground water monitoring wells not selected for use in the postclosure monitoring systems that are located in areas outside the reservoir will remain in place, but plugging and abandoning these wells after an initial year of postclosure monitoring is recommended.

2. The monitoring programs and procedures will be described in the OMMP, SAP and QAPP.

2.7 LANDSCAPING AND PERIMETER ACTIVITIES

1. This section describes the Site vegetation and perimeter activities, which include revegetation of the areas disturbed during cover construction (to reduce erosion), landscaping to improve aesthetics and a direct line-of-sight barrier, a stray ball fence along the northeast boundary, and fencing for security.

2.7.1 DESCRIPTION

1. The Site revegetation, landscaping and fencing plan is shown in Sheet 14 of the Design Plans. The Design Specifications and Plans indicate use of drought tolerant, primarily native ground cover species that have a root depth of less than 20 inches for the areas of RCRA Subtitle C- and D-equivalent covers with a soil surface. The function of the vegetation is to minimize erosion and improve aesthetics without affecting performance of the barrier components of the covers. Use of drought-tolerant species minimizes the need for irrigation. This cover vegetation will be established from seed.

2. The areas for enhanced aesthetic improvements are along the northeast perimeter of Areas 2, 3 and 4. These areas are adjacent to the private high school to the north and a residential community to the northeast. Larger plants and shrubs, with an associated irrigation system as necessary, will be planted in these locations as there are no conflicts between root systems and the cap components.

3. The 20-foot-high stray ball fence will be constructed along the top of the slope in the northeast portion of the Site, which is in the area where stray balls may land during field play at the high school. This fence will reduce the potential for balls to be lost and will assist in limiting potential reasons for Site trespassing to occur. A gate is provided between the ball field and the Site, but the area between the perimeter fence and the stray ball fence will be a fenced enclosure to prevent trespass onto the Site.

4. Site fencing will also be provided to improve Site security. The fencing plan is also shown in Sheet 14 of the Drawings. The fencing plan generally includes restoring the fencing at the boundaries of the occupied parcels (i.e., replacing the existing fencing along the active businesses) and reconstruction/rehabilitation of the perimeter fence along Greenleaf Avenue, the boundary shared with the high school and the short section along Los Nietos Road.

2.8 INSTITUTIONAL CONTROLS

1. This section discusses institutional controls proposed for the Site. Institutional controls are required by the AROD to ensure the long-term integrity of the remedy and to prevent exposure to waste remaining at the Site. While institutional controls are not specifically a part of the Workplan, they are discussed in this section as a reference for the reviewers and contractors.

2.8.1 OBJECTIVES

1. The objectives of institutional controls for the WDI Site, as stated in the AROD, are:
   - To provide notification to all potential Site users of the presence of hazardous material and onsite contamination.
   - To provide notification to potential Site users concerning the presence and location of all remedial systems.
   - To expressly prohibit residential land use on any part of the Site and limit future uses to certain industrial activities.
   - To minimize the potential for exposure of future Site users to site-related hazardous materials (including waste materials, ground water, and/or soil gas emissions).
   - To protect the integrity of the remedy from any activity that may interfere with the effective operation and maintenance of remedial control and monitoring systems.
   - To provide access to the Site for appropriate regulatory agencies and responsible parties engaged in approved remedial actions and monitoring activities.

2.8.2 DESCRIPTION

1. Environmental Restriction Covenants, as established in the CD, are restrictive legal covenants that grant a right of access for the purpose of conducting activities identified in the CD, and the right to enforce the land/water use restrictions listed in the CD. Section 6.0 of this plan discusses the procedures for monitoring and enforcement of institutional controls.

2.9 GENERAL OPERATIONS AND MAINTENANCE

1. Operation and maintenance activities are defined in the SOW as the management of staff, ordering of equipment and performance of necessary administrative functions to ensure that requirements and Performance Standards pursuant to the Consent Decree and SOW are achieved. These activities will include health and safety monitoring and enforcement,

employee training, budget administration, and O&M of any buildings and facilities required by the SOW, performance reporting, and payment of applicable taxes and fees. The required activities will be described in the OMMP and are briefly overviewed in Section 5.0 of this plan.

2.10 CLOSEOUT ACTIVITIES

1. The CD and SOW list requirements for the closeout of the Work. These requirements include:
   - Work Completion Report SOW Section 5.22.2
   - Certificate of Completion CD Section XV.62
     - Precertification Inspection CD Section XV.62a
     - Work Completion Report CD Section XV.62a

2. These closeout requirements will be discharged by the WDIG or its designated representatives or successors at such time it is believed that all phases of the Work, inclusive of Operations and Maintenance, have been completed.

3.0 PROJECT ORGANIZATION

1. This chapter presents the project organization, which includes a description of the responsibilities, authority and qualifications of personnel conducting the construction, operation and maintenance, and quality assurance activities for implementation of the remedy.

2. The principal organizations involved in the construction of the remediation system for the Site include EPA, WDIG, the Project Management Team, including quality assurance officers, and technical consulting oversight.

3. A project organization chart for the RAWP, indicating reporting structures and lines of communication, is presented as Figure 3.1. The responsibilities of key positions are described below, and in Table 3.1.

3.1 PROJECT ROLES AND RESPONSIBILITIES

3.1.1 U.S. ENVIRONMENTAL PROTECTION AGENCY

1. EPA is the lead agency, as defined in the National Contingency Plan (NCP), for the Site. EPA's review and approval of deliverables and other submittals provided for in the CD or required by the SOW will be conducted in accordance with the provisions of Section XII of the CD and Section 4 of the SOW. EPA will implement procedures to facilitate consultation between EPA, the WDIG, and the Interagency Committee, which represents other public entities.

2. EPA will establish and chair the Interagency Committee ("IAC") that meet on a periodic basis (e.g., quarterly) to advise the member agencies on the status of WDI Site project activities and developments. The purpose of the IAC is to provide a forum for public-sector agencies involved with the WDI Site to enhance and facilitate interagency coordination, to provide input to EPA in its role as lead agency, and to engage in ongoing consultations regarding the remedial action. The IAC for the WDI Site includes EPA as the lead agency and other State and local agencies as designated by EPA (e.g., DTSC, City of Santa Fe Springs). The IAC provides the primary mechanism for coordination and consultation for project-related matters among the member agencies for this project.

3.1.2 WDIG

1. The WDIG consists of the following Settling Defendants:
   - Archer Daniels Midland Company
   - Atlantic Oil Company
   - Atlantic Richfield Company
   - ChevronTexaco, Inc.
   - Conoco, Inc.
   - Conopco, Inc.
   - DiLo, Inc.
   - Exxon Mobil Corporation
   - Ferro Corporation
   - FMC Technologies, Inc.
   - GlobalSantaFe Corporation
   - Halliburton Energy Services, Inc.
   - McDonnell Douglas Corporation
   - Shell Oil Company
   - Union Oil Company of California
   - Union Pacific Railroad Company

2. The WDIG is responsible for the design, construction and operation of the remediation system. This responsibility includes complying with the EPA requirements and obtaining approval for the remedial action activities.

3. The WDIG will assemble a team of design and construction professionals to implement the Remedial Design Plans. The WDIG has the authority to select and dismiss organizations charged with design, construction activities, and quality assurance oversight. The WDIG also has the authority to accept or reject design plans and specifications, QA plans, reports and recommendations of the QA officers, and the materials and workmanship of the contractor. WDIG's work will conform to requirements of the AROD, CD and SOW.

3.1.3 WDIG COORDINATOR

1. The WDIG Coordinator is the site representative of WDIG. Responsibilities of the WDIG Coordinator are outlined in Table 3.1.

2. The WDIG Project Coordinator will be the focal point for communications with EPA and other parties working at the WDI Site. The WDIG Project Coordinator will serve as the primary point of contact for the EPA, WDIG, Supervising Contractor and Design Engineer and will coordinate work activities to be implemented by WDIG.

3. The WDIG Project Coordinator is Roberto Puga of Project Navigator, Ltd. The WDIG Project Coordinator has the following main role and responsibilities:
   - Represents WDIG at meetings.
   - Coordinates/liases between EPA, WDIG, Supervising Contractor, Design Engineer/Responsible Charge, and the CQA Contractor.
   - Coordinates submittal of deliverables required by SOW.
   - Fulfills the duties and requirements for the Project Coordinator as described in section XIII of the CD>

3.1.4 SUPERVISING CONTRACTOR

1. The Supervising Contractor is Remedial Construction Services, Inc. The Supervising Contractor ensures that the remedial construction is performed in accordance with the plans and specifications included in the Remedial Design Report. The Field Superintendent will represent the Supervising Contractor onsite and oversee subcontractors, quality control testing, field engineering and project support services. Responsibilities of the Supervising Contractor are outlined in Table 3.1.

3.1.5 CONSTRUCTION QUALITY ASSURANCE CONTRACTOR

1. The selected CQA Contractor is TRC. The CQA Contractor will oversee and inspect the construction phase of the remedial action. The CQA Contractor will have construction engineering experience, and possess the technical and managerial skills required for the construction phase oversight. The CQA Contractor responsibilities are summarized in Table 3.1.

3.1.5.1 QA Contractor Selection

1. An independent Quality Assurance (QA) Contractor will be chosen based on proper qualifications for this type of project. To maintain impartiality, the QA Contractor will report directly to WDIG. The QA Contractor should be independent from the Construction Contractor, and have the authority to stop work in the field because of quality assurance issues. In no case will the QA Contractor be the same as the Construction Contractor to prevent conflict of interest issues and insure impartiality in the QA work on the Site. The QA Contractor will have the qualifications and experience to do the work as described in Title 22, Section 4.5, §66264.19.

3.1.6 DESIGN ENGINEER/RESPONSIBLE CHARGE

1. The Design Engineer will have responsible charge of the work as defined in the Professional Engineers Act (Section 6703 of the Business and Professions Code of California), and will report directly to WDIG through the WDIG Coordinator as directed. The Design Engineer responsibilities are summarized in Table 3.1.

2. As responsible charge, the design engineer must be a California professional engineer. The selected engineer is Ken Floom, P.E. of Essentia, LLC. The professional engineer has responsible charge of the design approved by EPA, and will maintain independent control and direction of engineering work on this project.

3.1.7 PROJECT LABORATORIES

1. As required in the SOW, contracted laboratories for this project will adhere to the requirements summarized in Table 3.1. Project laboratories shall demonstrate the ability to meet all Performance Standards pursuant to the SOW and shall attain a minimum Data Quality Standard consistent with the Regional Data Quality Objectives (DQOs) and adhere to the requirements of the QAPP. This will generally be consistent with a Level III data quality standard.

3.1.8 TECHNICAL CONSULTING AND PROJECT SUPPORT PERSONNEL

1. The project work for the Remedial Design Plans will be performed by qualified personnel under the direction of the WDIG Coordinator or his designee. These activities will include sampling, field testing, data analyses, interpretations, and reporting. Technical consulting and project support personnel assigned to the project will have the experience and/or training required to complete their project assignment.

2. Project personnel will receive any specific special training that is required to perform their project-related duties. Such training may include but is not limited to:
   - Nuclear density gauge operation (for determining compliance with soil compaction specifications and clay moisture contents).
   - Special health and safety training (see Site Health and Safety Plan).
   - Spill control procedures.
   - Operation of field equipment.
   - Treatment plant operation.
   - Hydraulic testing of wells.

- Use of procedures provided in this RAWP.

3. The work that may be performed by technical consulting and project support personnel will be under the direction of the WDIG Project Coordinator, CQA Contractor or Supervising Contractor as appropriate to support these parties in fulfilling their various roles.

3.2 PROJECT TRANSITION

1. Project Transition involves an approach for transition and assumption of work from the Amended Administrative Order (97-09) to the CD. The transition will generally cover four areas:
   - Monitoring
   - Access Agreements
   - Site control
   - Data Management and Document control

2. A transition plan, including the procedures and elements required in Section 5.1.2 of the SOW is included in Appendix B.

3.3 SITE MANAGEMENT PLANS

1. Site Management Plans are required by the SOW (Section 5) to describe actions to be taken for various aspects of the Remedial Action and the transition of the site to commercial or other use upon completion of the construction activities. The following plans are required by the SOW:
   - Project Transition Plan.
   - Site Coordination Plan.
   - Mitigation Plan.
   - Site Security Plan.
   - Waste Materials Disposal Plan.
   - Stormwater Pollution Prevention Plan

   These plans are presented in Appendix B.

3.4 CONSTRUCTION MANAGEMENT

3.4.1 SITE COORDINATION

1. Implementation of the RAWP will require establishment of procedures to define how the work will be carried out. Specifically, procedures will be required to establish coordination

of CQA activities, progress reporting, remedial system documentation, compliance activities, building owner and tenant coordination, and public participation. These procedures will include activities and meetings designed to facilitate communications between EPA, IAC, and WDIG, and allow streamlining remedial project management and administration.

2. A Site Coordination Plan (SCP) is included in Appendix B.2. The SCP establishes integration and coordination procedures to facilitate the performance of the work.

3.4.2 MITIGATION PROCEDURES

1. Implementation of the RAWP will require mitigation procedures to minimize disruptions, inconvenience, and impacts to buildings, structures, and the occupants of existing buildings in order to perform the remedial action pursuant to the Amended ROD, the CD, and the SOW. The Supervising Contractor will prepare a Site Mitigation Plan (SMP) as an addendum to Appendix B of the RAWP, which will include procedures to control impacts to existing permanent structures, buildings, and building occupants during construction and monitoring activities. Procedures for notification, coordination, scheduling and logistics related to the implementation of the RAWP will also be included in the SMP. Elements of the SMP include:
   - Detailed descriptions of the impacts of the Work on specific buildings, and business activities and operations, including discussions of any disruptions, whether temporary or permanent, to ongoing business activities conducted at the sites of buildings, or to permanent structures.
   - Descriptions of actions or activities proposed to mitigate temporary disruptions to ongoing business activities at the various locations.
   - Discussion of notification procedures, coordination, scheduling, and logistics related to the implementation of mitigation for disruptions to existing permanent structures, buildings and business activities.
   - Procedures for coordination with the EPA Community Relations Program for the Site.
   - Schedules of Work activities that impact the building occupants.
   - Business site security provisions during Settling Defendants' remedial activities.
   - Instructions for temporary parking, if required.
   - Procedures for dealing with business occupant complaints and disputes.

3.4.3 SITE SECURITY

1. A Site Access and Security Plan (SASP) for maintaining control of access and security of the Site is included in Appendix B.4. The SASP includes the following:
   - Responsibilities for Site security.
   - Integration and Coordination with other parties at the WDI Site, including other entities who may be responsible for redevelopment.
   - Security Guard Qualifications and Training Requirements (personnel shall be 40-hour Occupational Safety and Health Administration (OSHA) trained for performing these activities).
   - Site Security Facilities.
   - Security Operations:
     - Operating hours
     - Access control
     - Gate check-in/out
     - Construction equipment access/exit
     - WDI Site communication
     - WDI Site integration and coordination
     - Emergencies
     - Storm events
     - Security checks and inspections
     - Unauthorized Site access (prevention and response procedures);
     - Record keeping
     - Management and supervisory assistance

2. The Contractor, upon mobilization to the Site, will implement the SASP. The effectiveness of the SASP will be reviewed during the construction progress meetings, discussed in the following section.

3.4.4 STORMWATER POLLUTION PREVENTION

1. During the rainy season a number of procedures will be implemented at the Site to ensure an appropriate response to excessive rainfall. The procedures have been incorporated into a SWPPP (Appendix B.6). The procedures are briefly discussed in the following paragraphs.

2. A daily weather forecast for the site area will be received and reviewed by the Contractor's Field Construction Superintendent. The weather forecast will be used to prepare for site inspection activities in response to storm events. These inspections are discussed below.

3. During rain events that are expected to generate greater than 2 inches of rain over a 24-hour time period, Contractor personnel will be dispatched to the Site during the time that rain is predicted to fall most heavily. The Site inspections will consist of the following items:

- Check that the Site surface water runoff is flowing unobstructed to the street and storm drains.
- Check that the surface soils are not excessively eroding, especially over the reservoir.
- Check that standing water is not ponding over large areas of the reservoir.

4. In the event that Site conditions during rain events indicate that runoff or standing water may be a problem, a Registered Professional Civil Engineer will be sent to the Site to make recommendations for temporary sandbagging or pumping activities that would improve Site conditions. Additional field activities (i.e., sandbagging, pumping) will not be performed without first obtaining approval from the EPA RPM.

5. A list of equipment and supplies that may be necessary to improve Site conditions include the following:

   - Backhoe
   - Trash Pumps
   - Plastic Sheeting
   - Sandbags

   Equipment and supply vendors located within the Site vicinity include the following:

   - Home Depot
     7015 East Telegraph
     City of Commerce, CA 90040
     (323) 727-9600
   - Orange County Sandbag
     2424 North Batavia
     Orange, CA 92865
     (714) 637-2000
   - United Rental
     13401 Rosecrans Avenue
     Santa Fe Springs, CA 90670
     (562) 802-2181

6. Execution of the storm related activities covered under this Plan should be made in conjunction with the recommendations in the Community Contingency Plan (Attachment A of the Site Health and Safety Plan). Additionally, a Stormwater Pollution Prevention Plan for the site has been prepared and is included as Attachment B.6 of this Plan.

3.4.5 CONSTRUCTION PROGRESS MEETINGS

1. Remedial construction progress meetings will be held on a weekly basis. The Supervising Contractor, CQA Contractor, design personnel and the WDIG Coordinator will participate in the meetings. The procedures for organizing and holding the progress meetings are provided in the Project Procedures Manual (Appendix A). The agenda for the meeting will be established by the WDIG Coordinator and will include progress updates, modifications to the project schedule, project submittals, discussion of CQA and/or compliance issues, and Site coordination. The meetings will form the basis of progress reports to be submitted to the EPA. Meetings will generally address issues such as design modifications, field change documentation and project proposals/technical memoranda, along with other construction issues. Procedures for managing these issues will be included in Appendix A.

3.4.6 COMPLIANCE WITH APPLICABLE LAWS AND PERMITTING

1. All activities undertaken by the Settling Defendants pursuant to the Consent Decree shall be performed in accordance with the requirements of all applicable Federal and State laws and regulations. The Settling Defendants must also comply with all applicable or relevant and appropriate requirements of all Federal and State environmental laws as set forth in the Amended ROD and Consent Decree SOW.

2. As provided in Section 121(e) of CERCLA and Section 300.400(e) of the NCP, no permit shall be required for any portion of the Work conducted entirely onsite (i.e., within the areal extent of contamination or in very close proximity to the contamination and necessary for implementation of the Work), including, without limitation, any post-closure permit that may be otherwise required under state law or regulations. Where any portion of the Work that is not onsite requires a federal or state permit or approval, Settling Defendants shall submit timely and complete applications and take all other actions necessary to obtain all such permits or approvals.

3. Surface water runoff from the Site is subject to NPDES requirements. Otherwise, as stated above, building permits and other local requirements are not required for CERCLA remediation activities. However, based on experience, the simplest way to verify attainment of the substantive requirements of such permits is to submit for appropriate review with the understanding that the permit is not needed to begin the work. It will be the responsibility of the Supervising Contractor to verify attainment of the substantive requirements of the building codes. These codes will apply to construction of the ball fence, the perimeter fence,

the storm drain, and landscaping. South Coast Air Quality Management District (SCAQMD) permit requirements will also apply to the gas treatment system exhaust.

3.4.7 PROJECT PROCEDURES MANUAL

1. Appendix A of the RAWP is the Project Procedures Manual (PPM). The purpose of the PPM is to provide standard operating procedures for conducting remedial construction activities, to ensure consistency and compliance with the SOW. The PPM includes specific procedures for management and administrative procedures required by the SOW, as well as other general activities, such as procurement, preparing and issuing required submittals, performing inspections, adding new procedures or making other modifications to the PPM. The PPM will be updated as requirements for new procedures occur or modifications to existing procedures are required.

3.4.8 DELIVERABLES REQUIRED BY THE SOW

1. Deliverables required by the SOW include management plans, notifications, requests for authorization, and reports to EPA for review and approval pursuant to provisions included in Section XII of the CD. Procedures for the preparation, submittal and approval of the deliverables will be included in the PPM. The required deliverables include the following plans and documents:
   - Relocations Implementation Plan (if determined necessary by EPA).
   - Health and Safety Plan (HASP).
   - Quality Assurance Project Plan (QAPP).
   - Construction Quality Assurance (CQA) Plan.
   - Compliance Testing Plan (if not prepared as part of the O&M Plan).
   - Noncompliance Notification(s), Compliance Action Plans, and Noncompliance Correction Reporting (if required by EPA).
   - Corrective Action Plan(s).
   - Operation Monitoring and Maintenance Plan (OMMP).
   - Project Proposals, Major/Minor Technical Memoranda (as may be required by EPA or as proposed by WDIG and approved by EPA).
   - Sampling and Analysis Plan (SAP).
   - Site Access and Security Plan.
   - Community Relations Participation Plan.
   - Institutional Controls Monitoring and Enforcement Work Plan.
   - Construction As-built Report(s).
   - Progress Reports.
   - Annual Work Status Reports.
   - Five-Year Remedy Review/Work Status Reports.
   - Remedial Action (RA) Completion Report.
   - Work Completion Report.

2. Construction of the remedy will be considered complete when the RA Completion Report is approved by EPA. These include long-term ground water monitoring, institutional controls monitoring, soil gas monitoring and operations and maintenance. Deliverables associated with these activities, including ground water monitoring reports, Annual Work Status Reports and Five-Year Remedy Review/Work Status Reports, will be submitted to the EPA according to the schedule contained in the SOW.

3.5 HEALTH AND SAFETY

1. The HASP describes the minimum health and safety requirements and procedures that will be used during construction and operations and maintenance at the Site. The HASP will be prepared by the Contractor and submitted to EPA and WDIG. The scope and organization of the HASP is outlined below.

2. The HASP will include the following elements:
   - Introduction and Purpose.
   - Applicable Laws and Regulations.
   - Onsite Organization and Coordination.
   - Medical Surveillance Program.
   - Chemicals of Concern.
   - Activities Hazard Analysis.
   - WDI Site Control, Work Zones and Security Measures.
   - General Safe Work Practices.
   - Training.
   - Personal Protective Equipment.
   - Onsite Work Plans.
   - Standard Operating Procedures.
   - Communication Procedures.
   - Personnel Exposure Monitoring Plan.
   - Decontamination Procedures.
   - Work Disruption Notification Procedures.
   - Long-Term Postconstruction Commercial Access Control Procedures.
   - Community Safety Plans.
   - Emergency Response Plan, which includes:
     - Contingency Plan
     - Description of responsibilities of an Emergency Coordinator
     - Description of procedures for coordination with persons or organizations responsible for offsite emergency response(e.g., fire department).
   - Procedures for updating and distributing the HASP.
   - Record-keeping procedures.
   - Requirements for Contractors and Subcontractors.
   - Procedures for special activities.

3. The HASP will also include the local emergency contacts, telephone numbers and maps of Site access and routes to local hospitals.

3.6 MOBILIZATION

1. The first activity performed at the Site will be mobilization. During this period, the Project Manager and the Supervising Contractor will set up onsite facilities, including an office trailer, phone, utilities and other facilities. Additionally, the ingress and egress routes for construction vehicles will be designated and decontamination and stockpiling areas will be identified. Building tenants will be notified prior to the start of construction and lines of communication and contact information will be developed.

2. Contractor equipment and any construction materials (e.g., geosynthetics for RCRA cover) will also be brought on to the Site during this period. As the work is in several phases, there will likely be more than one delivery of construction materials and possibly ancillary mobilizations. However, the temporary onsite facilities will remain through all the construction activities.

3.7 CONSTRUCTION METHODS AND APPROACH

1. This section generally describes the methods, materials and equipment that will be used to complete the Remedial Work at the Site as described in the CD, SOW and approved Remedial Design Reports. Nine key components comprise the remedial measures. Table 4.3 in the Prefinal (90%) Design Report (Revision 1.0) Soils, Subsurface Gas and Ground Water Remedial Design (TRC, January 2003) lists the detailed list of performance standards and engineering details for each component. Six of the components are construction related. The construction related components are:

   - Subtitle D-Engineered Cover.
   - RCRA Subtitle C-Equivalent Cover.
   - Leachate Monitoring and Control System.
   - Gas Migration Control Systems.
   - Building Modifications.
   - Surface Drainage Control System.

   Each of these components are described in Section 2, and provide a general sequence of construction activities. General descriptions of equipment, materials and construction methods to be used are described below. Specific construction and quality assurance details for each component are presented in the Final Design Report that was approved by EPA in June 2003, and the CQA Plan currently being prepared by the WDIG.

2. Various types of heavy construction equipment will be used during the excavation and construction portions of the remediation work. These include backhoes, bulldozers, scrapers, graders, soil compactors and water trucks. Other equipment that will be brought onsite by subcontractors will likely included asphalt pavers, cement haulers and dump trucks. The Contractors and subcontractors will determine the exact equipment needed to complete each component.

3. Surveying will be conducted as required to locate various design features and to determine when final grade is reached for the surface drainage control and cap slopes. Final certification of the grades will be submitted by the surveyor as part of the completion report at the end of the construction activities.

4. The actual sequencing of the work will be determined by the Contractor based on the logistics at the time work commences. The Contractor will also have the ability to submit design modifications for approval if the contractor feels that a different method or other change would be more protective than that shown in the Remedial Design and Technical Specifications or save time and/or reduce costs. The procedure for approving the design modification is given in the Project Procedures Manual in Appendix A.

3.8 DEMOBILIZATION

1. Following completion of all the construction work, demobilization will be performed. Demobilization will include removal of temporary facilities (including the soil staging areas and site trailer), removal of contractor equipment, final removal of debris and unused construction material and disconnecting utilities.

2. The demobilization will be performed under the supervision of the General Construction Superintendent. During demobilization the Construction Superintendent will verify that all security measures are in place (i.e., locks on gates, proper signage) and that above ground remediation fixtures and equipment are in proper working order (i.e., gas treatment system and venting wells). Following demobilization, the only facilities that will remain onsite are the power conduit, monitoring and other wells, gas treatment system, irrigation system, and stormwater facilities. There will be no office trailer.

3.9 FINAL INSPECTION, DOCUMENTATION AND REPORTING

1. Final inspection, documentation and reporting are required by the SOW to verify attainment of standards and obtain EPA approval for completion of the construction work. These activities are part of the CQA program and will be described in the CQA Plan.

2. Final inspection by EPA will be performed just prior to demobilization. The EPA may perform interim inspections at any time during constructions. The final inspection will confirm that all punch list activities identified during the interim inspection have been completed.

3. After the final inspection and demobilization a Construction As-Built Report will be submitted to EPA. The report will include as-built drawings signed and stamped by a California State Registered Professional Engineer, construction Quality Assurance/Quality Control (QA/QC) records, Remedial Systems Compliance Testing Plan. Summary of design changes and a revised OMMP if required. The report will contain all other information and requirements as stipulated in the SOW.

3.10 CONTINGENCY PLANS

1. The following three levels of contingency planning were incorporated in the Final Design Report submittals:
   - Design contingencies that can be implemented in the event field conditions are found to be significantly different from those outlined in the design report and implementation documents.
   - Implementation contingencies that could be utilized during remedy activities to manage and correct impacts from potential releases of AROD constituents.
   - A spill control plan to deal with potential spillage of impacted water, reagents and other materials utilized and/or handled by the construction contractors.

   Contingency planning is also described in the Remedial Design Report.

2. In addition to contingencies that have been incorporated into the design, an evaluation of potential construction, schedule, and O&M risks was performed to outline potential contingency strategies that could be implemented in the event that these risks actually occur. The risks and contingencies are presented in Table 3.2.

4.0 PROJECT SCHEDULE

1. A comprehensive schedule that covers all elements of the remedial work has been prepared by the selected contractor and is presented in Figure 4.1. The schedule is organized to show the sequencing of the work. A project evergreen schedule will be maintained by the contractor and be periodically updated during construction.

2. The schedule has only a few areas where delays could occur. Risks to the schedule and contingency plan outlines are discussed in Section 3.10. It is expected that the contractor, WDIG, EPA, and Site tenants will work closely to minimize schedule impacts related to logistical issues.

4.1 SCHEDULE REVISIONS AND UPDATES

1. The schedule will be maintained as an appendix to the RAWP and will be updated monthly by the contractor during construction. The schedule was used as a basis for developing the plans and specifications, and is preliminary, therefore subject to updates. Procedures for updating the schedule are included in Appendix A, and include distribution procedures to assure that all parties are working with the most recent information.

4.2. SEQUENCING

1. During construction activities it may become necessary to mitigate impacts to surrounding areas due to weather or other factors (e.g., neighbor complaints) that may affect the sequencing of the remediation. Prior to the start of construction activities neighboring businesses and residences will be notified. Standard construction practices will be used to control dust, odors and noise (e.g., water truck, covering stockpiles as necessary, and construction activities during daylight hours). In the event the complaint cannot be addressed locally to the satisfaction of the parties involved, the WDIG Project Coordinator and EPA would be notified.

5.0 OVERVIEW OF OPERATION AND MAINTENANCE ACTIVITIES

1. This section presents the framework for implementation of the OMMP at the Site. The O&M activities include implementation as well as postclosure activities. A general overview of the O&M activities at the Site are provided in the following sections. Detailed descriptions of the implementation, long-term and postclosure O&M will be provided in the OMMP.

2. Specifically, the O&M activities to be performed at the Site include:
   - Visual inspection of the RCRA Subtitle C-equivalent and Subtitle D-equivalent caps.
   - Vapor treatment system operation, inspection and carbon changeouts.
   - In-business air quality monitoring.
   - Vapor well sampling.
   - Ground water well sampling.
   - Stormwater sampling.
   - Monitoring of leachate levels and leachate removal.
   - Site security.
   - Reporting.
   - Landscape maintenance.

5.1 VISUAL INSPECTION OF RCRA COVERS

1. The RCRA Subtitle C-equivalent and the portions of the Subtitle D-equivalent covers will be examined on a periodic basis for signs of erosion or settling. If erosion or settlement is discovered then corrective measures will be implemented to correct those areas of the cover with observed problems. Additionally, the vegetation will be observed for areas of poor or no growth. Corrective action will be taken once the cause of the poor vegetative cover is identified.

2. The portions of the RCRA Subtitle D-equivalent cover that are asphalt or concrete will be visually inspected for cracks or settlement. If cracks, settlement or other defects are observed corrective action will be taken. Building foundations will be inspected if In-Business Ambient Air Monitoring indicates that the foundation may be damaged.

5.2 VAPOR TREATMENT SYSTEM INSPECTION

1. The vapor treatment system will be periodically inspected to insure proper operation. The effluent gas will be periodically tested to ensure that emissions limits are not exceeded and

to identify when carbon changeouts are necessary. An autodialer will be connected to the treatment system to record flow rate information and to identify times when the blower has shut down and needs to be restarted.

5.3 MONITORING SYSTEMS

1. Monitoring will be described in the long-term monitoring plans that will be included with the OMMP. Monitoring procedures and quality procedures are described in the QAPP and SAP as discussed in Section 1.4.

5.3.1 IN-BUSINESS AIR QUALITY MONITORING

1. In-business air quality monitoring will continue to be performed on a routine periodic basis. The existing in-business monitoring program (approved February 9, 2001) will be used to determine the frequency and locations of monitoring. Four additional locations are recommended in the Remedial Design. If in-business monitoring shows constituents-of-concern are above levels of concern, corrective action will be taken, as discussed in Section 2.4.3.

5.3.2 VAPOR WELL MONITORING

1. Vapor well sampling will be conducted on a periodic basis to establish compliance with the Soil Gas Performance Standards for the Site. The Remedial Design Report shows the locations of the vapor monitoring wells and gives a proposed monitoring schedule.

5.3.3 GROUND WATER MONITORING

1. Ground water monitoring wells will be sampled on a periodic basis. There are four locations for monitoring wells proposed in the Design Report:
   - Background Wells.
   - Point of Compliance (POC) Wells.
   - Near-Source Detection Wells.
   - Verification Well or Guard Wells.

   These wells will be sampled and the samples analyzed for VOCs and general ground water quality parameters.

5.3.4 STORMWATER MONITORING

1. The stormwater runoff systems (i.e., berms, swales, cleanouts and catch basin) will be visually inspected and cleaned or repaired as necessary for the system to operate properly.

2. Stormwater monitoring during construction will be performed at the Site is further described in the SWPPP in Appendix B.6. Stormwater sampling after completion of construction also will be conducted and will consist of sampling after the first significant precipitation event and again after a second precipitation event. Contingency plans will be included in the OMMP in case site-related constituents are detected above levels of concern.

5.3.5 SETTLEMENT MONITORING

1. Settlement monitoring will be performed through periodic survey of the settlement monuments at the site. The locations and coordinates of the settlement monuments will be indicated in the as-built drawings. Excessive settlement will be reported and an evaluation of the need for corrective action would be performed.

5.4 LCRS MONITORING/CONTROL SYSTEM

1. Four LCPs will be installed within the boundary of the reservoir to monitor free liquids within the zone immediately above the concrete bottom of the reservoir. The number and location of the LCPs were established based on the results of Draft Technical Memorandum No. 13 (TRC, August 2000).

2. The leachate levels in each well will be monitored periodically to determine the level of leachate present in the reservoir. When the level in any well reaches 12 inches or more the leachate will be removed and sent to an offsite disposal facility or treated onsite. Testing may be performed on the leachate to determine what, if any, constituents are present and their concentrations. This would be done to determine if the leachate must go to a disposal facility or if it can be treated onsite (i.e., granular activated carbon) and discharged. Liquid level monitoring and procedures for removing excessive liquids will be provided in the OMMP.

5.5 SITE SECURITY

1. Visual inspections of the perimeter fencing, well heads, treatment system and other Site features will be conducted on a regular basis. These inspections will check for vandalism or other damage caused by Site traffic. The integrity of the fence will be checked to insure that gates are working properly and locks are in place. The Site access and security plan is included as Appendix B.4 of the RAWP. Details of the Site security protocols and procedures is given in the OMMP.

5.6 LANDSCAPE MAINTENANCE

1. Maintenance of the landscaping will include irrigation of the trees and shrubs near the high school, and periodic activities such as mowing the capped areas and pruning vegetation.

6.0 OVERVIEW OF INSTITUTIONAL CONTROLS AND RELATED PROCEDURES

1. The objectives of institutional controls for the WDI Site are:
   - To provide notification to all potential Site users of the presence of hazardous materials and onsite contamination.
   - To provide notification to potential Site users concerning the presence and location of all remedial systems.
   - To expressly prohibit residential land use on any part of the Site and limit future uses to commercial and light industrial activities.
   - To minimize the potential for exposure of future Site users to site-related Waste Materials.
   - To protect the integrity of the remedy from any activity that may interfere with the effective O&M of remedial control and monitoring systems.
   - To provide access for appropriate regulatory agencies and responsible parties engaged in approved remedial actions and monitoring activities.

2. Institutional controls will be implemented through the use of Environmental Restriction Covenants (ERCs). Pursuant to the CDs between EPA and the owners of property at the WDI Site, these owners will be required to execute and record an Environmental Restriction Covenant on its property at the Site. The WDIG shall prepare, update, and implement an Institutional Controls Monitoring and Enforcement Work Plan, to be approved by EPA beginning at such time as the first ERC has been recorded on the property.

3. The Institutional Controls Monitoring and Enforcement Work Plan was prepared by the WDIG and includes the following:
   - Description of all properties where access agreements and Environmental Restriction Covenants are required by the Consent Decree. The descriptions will include names and addresses of the owners and tenants of the properties, the locations of the properties at the Site, current land use, and anticipated future land use.
   - Description of all properties where access agreements and Environmental Restriction Covenants have been implemented in accordance with the requirements of the Amended ROD. The descriptions will include names and addresses of the owners and tenants of the properties, the locations of the properties at the Site, current land use, and anticipated future land use.
   - Draft and final access agreements and Environmental Restriction Covenants to be implemented pursuant to the Consent Decree and the Amended ROD.
   - Description of the monitoring activities to be performed by the WDIG.

- Discussion of potential enforcement mechanisms to be used in cases of noncompliance, including but not limited to:
  - Discussion of the formats and organization of Institutional Controls Compliance checklists;
  - Discussion of the formats, organization, and procedures for Noncompliance Notification to Landowners;
  - Discussion of the formats, organization, and procedures for reporting of noncompliance notifications to EPA; and
  - Discussion of the formats and organization of Corrective Action Procedures and Correction Reports.

4. Monitoring of the Environmental Restriction Covenants will consist of quarterly, or at a frequency otherwise directed by EPA, inspections of the properties at the Site on which Environmental Restriction Covenants have been recorded. The WDIG Site Trust will note any violations of the Environmental Restriction Covenants and report any violations to EPA within ten (10) days of the inspection. The WDIG Site Trust will review the title documents in the County Recorder's Office for Los Angeles County semiannually, or as directed by EPA, to determine whether or not Environmental Restriction Covenants remain in place on the properties at the Site. The EPA will be notified within five (5) days of such inspection of the removal or modification of any of the Environmental Restriction Covenants at the Site.

5. The WDIG Site Trust will not be required to enforce the Environmental Restriction Covenants for any property on which a new building or other permanent structure has been constructed after the date of lodging of the Consent Decree, or on properties on which buildings are substantially modified and in a manner that requires a City of Santa Fe Springs building or other land use permit. EPA has the right to review and approve plans for new construction at the Site, and may enlist WDIG to assist in that review. The WDIG Trust will continue to monitor the parcels with new or modified construction as per the ICMEWP.

7.0 OVERVIEW OF SITE REDEVELOPMENT AND RELATED PROCEDURES

7.1 ISSUES RELATED TO REDEVELOPMENT

1. The Site may be redeveloped in the future, as stated in the AROD. Redevelopment and restoration activities could require regrading or excavation in areas where the waste has been capped, or require penetration or modification of the various cover systems that are incorporated in the remedy. Redevelopment could also require relocation of monitoring facilities or rerouting of stormwater runoff.

2. The remedy and design have been prepared so as not to preclude redevelopment. However, future redevelopment at the Site will need to be coordinated with the EPA and WDIG to assure that any future construction does not impair the long-term integrity of the remedy and is consistent with the design basis, objectives, and parameters described in the Remedial Design Report.

3. Coordination between WDIG, EPA and any potential redevelopers will be led by EPA. EPA may call upon WDIG to assist EPA in the review of plans for redevelopment. Table 1.1 summarizes redevelopment coordination.

7.2 SITE COORDINATION

1. Procedures for reviewing redevelopment plans and undertaking restoration of affected facilities are included in the Project Procedures Manual. Through the IAC process, EPA will coordinate requirements, schedules, technical reviews, and comments with other public entities, including the City of Santa Fe Springs, to facilitate the timely and effective review of proposed redevelopment projects. Procedures for coordination with entities involved in future redevelopment of the Site, including transfer and dissemination of information on Site design, construction, operations, monitoring, site security and access, corrective action, emergency response and community involvement will be included.

8.0 REFERENCES

Environmental Protection Agency (EPA). *Amended Record of Decision (AROD) - Soils and Subsurface Gas Operable Unit.* June 2002.

EPA. *Feasibility Study Report for Soils and Subsurface Gas Waste Disposal, Inc. Superfund Site, Santa Fe Springs, California.* August 2, 1993.

EPA. *Record of Decision (ROD) - Soils and Subsurface Gas Operable Unit.* December 22, 1993.

EPA. *Statement of Work (SOW).* August 2003.

TRC. *Final (100%) Design Report Soils, Subsurface Gas and Ground Water Remedial Design, Waste Disposal, Inc. Superfund Site.* May 2003.

TRC. *Prefinal (90%) Design Report (Revision 1.0) Soils, Subsurface Gas and Ground Water Remedial Design.* January 2003.

TRC. *Draft 2000 Annual Monitoring Report, Waste Disposal, Inc. Superfund Site.* February 2002.

TRC. *Draft 2001 Annual Monitoring Report, Waste Disposal, Inc. Superfund Site.* June 2002.

TRC. *Supplemental Feasibility Study (Revision 4.0), Waste Disposal, Inc. Superfund Site.* March 2001.

TRC. *Remedial Design Investigate Activities Summary Report (Revision 2.0).* May 2001.

TRC. *Supplemental Subsurface Investigation, RD Investigative Activities, Waste Disposal, Inc. Superfund Site.* February 2001.

TRC. *Draft TM No. 13 Reservoir Liquids Closeout Report and Addendum No. 1 Comprehensive Ground Water Quarterly Monitoring Plan (Revision 2.0), Waste Disposal, Inc. Superfund Site.* August 2000.

TRC. *Remedial Design Investigative Activities Summary Report (Rev. 1.0), Waste Disposal, Inc. Superfund Site.* August 1999.

TRC. *TM No. 9A Soil Vapor Extraction Testing Report of Findings, Waste Disposal, Inc. Superfund Site.* March 1999.

TRC. *Technical Memorandum No. 11 - Reservoir Area Grading Plans and Waste/Debris Management As-Built Report, Waste Disposal, Inc. Superfund Site.* December 1998.

TRC. *Prefinal (90%) Design Report, Waste Disposal, Inc. Superfund Site.* April 1996.

9.0 GLOSSARY

Remedial Design Plans: The Construction Drawings in Appendix G of the Final Remedial Design report.

Remedial Design Specifications: The Specifications presented in Appendix I of the Final Remedial Design Report.

Remedial Design Implementation: Construction and Operation and Maintenance (O&M) of the design described in the Final Remedial Design Report.

Remedial Work: The complete remedy including Remedial Design, Remedial Design Implementation, Community Relations, Institutional Controls, and O&M.

Supervising Contractor: The contractor selected to perform the Remedial Design Implementation

Contractor: A company selected to assist in performing the remedial work.

Remedial Design: The design presented in the Final Remedial Design Report; in particular, the Remedial Design Plans and Specifications.

Tables

TABLE 1.1

GENERAL SUMMARY OF REDEVELOPMENT PROCESS WDI SUPERFUND SITE

ENTITY	PROCESS REQUIREMENTS
City of Santa Fe Springs	**WDI Site Specific Plan** – The City is in the process of drafting a specific plan for the WDI Site. The Specific Plan will include restrictions on the use and development of properties on the Site. **City Building Code** – There are regulations and restrictions common to all redevelopment in the City, which include building construction and size requirements. **Methane Non-attainment Zone** – There are special environmental protection requirements to mitigate against elevated levels of methane and other soil gases.
U.S. EPA	The Environmental Restrictive Covenant that is part of the Consent Decree with Site parcel owners contains a requirement of obtaining EPA concurrence with any new redevelopment plans. EPA primary focus in its review would be in maintaining the integrity of the remedy and assuring access to monitoring systems.
WDIG	The WIDG does not have a formal role in the redevelopment approval process. However, the WDIG would assist EPA in the review of redevelopment plans. The WDIG's primary concern is maintaining the integrity of the remedy.
Owner/Tenant	Must meet the City's requirements. Must demonstrate that the redevelopment maintains the integrity of the remedy. Must design the redevelopment to accommodate the geotechnical and environmental conditions of the site.

TABLE 1.2

REMEDIAL ACTION WORKPLAN REQUIREMENTS
CD SCOPE OF WORK (SOW)
WDI SITE

REQUIREMENT	WHERE ADDRESSED IN REMEDIAL ACTION WORKPLAN
1. Project background narrative.	Section 1.1
2. Statement of problems posed by the Site and the objectives and requirements of the remedial actions.	Section 2.0
3. Format for Progress Reports to be submitted, pursuant to Section XI, Paragraph 41 of the CD.	Appendix A.12
4. Format of regularly scheduled remedial construction progress meetings.	Section 3.4.5
5. Procedures for modifying the RAWP, other management plans, and other deliverables and schedules required by the SOW.	Appendix A.2
6. Procedures for the selection of an independent contractor, for approval by EPA, to perform construction quality control activities.	Section 3.1.5
7. Activity-specific sampling plans, if not covered by currently approved sampling plans.	Appendix A.6
8. Procedures for the preparation of construction, and construction management activities, including particular procedures that would be associated with fast-track approaches, if proposed by Settling Defendants.	Section 2.0
9. Procedures for design-specific review processes to accomplish regular and timely updates of design activities (for in-progress design activities and design deliverables if required in addition to the remedial design documentation approved under the Amended UAO), and fast-track processes as approved by EPA.	Appendix A.9
10. Procedures for modifying final plans and designs after approval.	Appendix A.2, Appendix A.9
11. Procedures for documenting field changes during construction.	Appendix A.10
12. Procedures for initiating and implementing the Project proposal/Technical Memoranda pursuant to Section 5.10 of this SOW.	Appendix A.11
13. Procedures for monitoring and enforcement of institutional controls for the Site, including format and content of proposed checklists and reports.	Section 6.0
14. Procedures for the mitigation of impacts to existing buildings, permanent structures, and occupants.	Section 2.0
15. Procedures for review and oversight of redevelopment design (anticipated to be by other entities) to ensure that integrity of Site remedial systems (e.g., caps, monitoring wells and probes, and surface water controls) is maintained or improved.	Section 7.0 Appendix B.2
16. Procedures for the coordination with all entities involved in any future redevelopment of the Site, including procedures for transfer and dissemination of information on site design, construction, operations, monitoring, site security and access, corrective action, emergency response, and community involvement.	Section 7.0 Appendix B.2
17. Procedures for the review of all Applications for Exceptions to the land/water use restrictions described in Section IX, paragraph 25 (Access and institutional controls) of the CD.	Section 6.0 Appendix A.8

TABLE 1.2

REMEDIAL ACTION WORKPLAN REQUIREMENTS
CD SCOPE OF WORK (SOW)
WDI SITE
(Continued)

REQUIREMENT	WHERE ADDRESSED IN REMEDIAL ACTION WORKPLAN
18. Format and approach for transition and assumption of work under the Amended UAO addressing the following elements.	
• Procedures to coordinate and integrate the transition with other site activities including those activities listed in Section 1.2.1 of the SOW.	Section 5.0
• Procedures and schedule for verification that existing facilities proposed for transitioning to the Settling Defendants meet Performance Standards.	Section 7.0
• Personnel and facilities mobilization logistic and schedule.	Section 3.6, Section 3.8
• Procedures to be used to amend or otherwise modify approved management plans for incorporation of changes in required activities as may be proposed by the Settling Defendants or required by EPA.	Appendix A.2
• Training of the Settling Defendants' Supervising Contractor, if applicable.	Section 3.1.4
• The process and schedule for transition or transfer of existing and/or new acquisition of all insurance, operating, waste discharge and other permits, and permits and licenses required for conducting the Work specified by the Consent Decree, including special maintenance activities required in easements and right-of-ways under the control of other parties.	Appendix A.8

30747-3500 (7/24/03/rm)

TABLE 2.1

GAS STANDARDS FOR CHEMICALS OF CONCERN WASTE DISPOSAL, INC. SUPERFUND SITE

COMPOUND	SOIL GAS PERFORMANCE STANDARD[1] (ppbv)	INDOOR AIR THRESHOLD LEVELS[2] (ppbv)
Benzene	10	2.0
Carbon Tetrachloride	21	0.68
Chloroform	20	3.4
1,2-Dibromoethane	1	0.06
1,2-Dichloroethane	20	3.6
cis-1,2-Dichloroethene	180	18.6
1,1-Dichloroethene	100	53[3]
1,2-Dichloropropane	20	1.86
trans-1,2-Dichloroethene	400	36.8
Ethylbenzene	5,000	490
Tetrachloroethene	500	10.6
Toluene	2,000	212.0
1,1,1-Trichloroethane	3,600	368.0
Trichloroethene	200	8.2[4]
Vinyl Chloride	10	0.25
m,p-Xylene	4,000	142.8
o-Xylene	4,000	142.8
Methane	1.25% (near buildings) 5% (site perimeter)	1.25%

(1) EPA, Amended Record of Decision, Waste Disposal, Inc. June 2002.

(2) CDM Federal Programs Corporation, Subsurface Gas Contingency Plan, Waste Disposal, Inc. Superfund Site, July 1997.

(3) Developed separately by EPA (i.e., subsequent to the "Subsurface Gas Contingency Plan").

(3) EPA Region 9 is considering changing the PRG for trichlorethene which would decrease the Indoor Air Threshold Levels (IATL) from 8..2 to 0.9.

TABLE 3.1

SUMMARY OF PERSONNEL RESPONSIBILITIES
WDI SITE

POSITION	RESPONSIBILITIES
WDIG Project Coordinator **Roberto Puga,** **(Project Navigator, Ltd.)**	• Overall project management. • Overall RA work confirms to AROD, CD, SOW, RAWP and related Site Management Plans, and Remedial Design Plans. • Coordinates implementation of the Institutional Controls Monitoring and Enforcement Work Plan (to be implemented by WDIG Trustee) and Community Relations Participation Plan. • Understands applicable requirements of the CD, AROD, SOW and the Remedial Design Plans. • Fulfills the duties and requirements for the Project Coordinator as described in Section XIII of the Consent Decree. • Serves as the focal point for communication between the EPA, WDIG, IAC and the technical consultants. • Technical and managerial responsibility for the project, including assisting with contract negotiations and authorization and accounting for the following: - Analytical laboratories. - Technical consultants. - Construction contractors/subcontractors and suppliers. • Provides overall management and implementation of project-wide QA. • Provides Site and project management for O&M activities. • Reviews applications for payment with Design Engineer, the CQA Contractor, Supervising Contractor, subcontractors, technical consultants and vendors. • Monitors performance with respect to project schedules, budgets and objectives.
Design Engineer/ Responsible Charge: **Ken Floom, P.E.** **(Essentia, LLC)**	• Understands the requirements of the CD, AROD, SOW and the Remedial Design Plans. • Professional Engineer in responsible charge of the project as defined by the Professional Engineers Act (Business and Professions Code Section 6700 et seq.) • Acts as technical liaison for the WDIG Coordinator and EPA for engineering design concerns, as directed by the WDIG Coordinator. • Provides and/or interprets drawings or other engineering information for the WDIG Coordinator or his designate. • Reviews and evaluates contractor's suggestions for modifications in engineering design plans. Reports the results of the review or evaluation, and suggestions and modifications to the WDIG Coordinator. • Implements changes to Remedial Design Plan Engineering Drawings and other engineering information as directed by the WDIG Coordinator. • Prepares, reviews, and submits As-Built Drawings and/or reports required for this project, ensuring the technical quality of reports and submissions are acceptable and that procedures used to develop conclusions and recommendations are appropriate and correctly applied.

TABLE 3.1

SUMMARY OF PERSONNEL RESPONSIBILITIES
WDI SITE

POSITION	RESPONSIBILITIES
Supervising Contractor (Remedial Construction, Inc.) **Field Superintendent: Andy Tilleree**	• Understands the requirements of the Remedial Design Plans. • Understands requirements of the AROD, CD, SOW, RAWP, OMMP, and Remedial Design Plans. • Performs OM&M as authorized by the WDIG. • Understands the Remedial Design construction specifications and plans. • Manages the day-to-day activities of the subcontractors and project support services with respect to schedules, budgets and objectives. • Prepares project summary and status reports. • Reviews inspection and correction action reports with respect to the work efforts of the contractors and technical consultants. • Provides construction and project management for construction activities. • Serves as the WDIG Coordinator's liaison with contractors and Design Engineer for construction related tasks.
Field Engineer **Bill Garrido (Recon)**	• Implements the QAPP and SAP. • Coordinates with Field Superintendent, contractors and CQA Contractor to address technical questions, issues, modifications and problems. • Processes contractor submittals. • Coordinates the approval of field engineering changes. • Prepares daily activity logs. • Provides general support to the Field Superintendent.
CQA Contractor (TRC) **CQA Officer: Scott Brown, P.E.**	• Assures that performance standards will be attained and construction meets Design Specifications and plans. • Prepares CQA Plan (by a California Civil P.E.). • The CQA contractor must be independent from the field construction management and construction contractors and subcontractors. • Has authority to stop construction work. • Maintains documentation supporting CQA activities and verification testing. • Understands the requirements of agreements/contracts with contractors, subcontractors, and material equipment and instrumentation suppliers/vendors used for construction activities. • Administers and verifies compliance with QAPP and SAP. • Trains support personnel for construction oversight activities. • Reviews and understands shop/vendor drawings for equipment and instrumentation required for construction, recording date of receipt of shop drawing, and making copies of drawings and file originals in Site project file, sending copies to design engineering office file and keeping an updated drawing control log showing the most current revision of the drawing. • Monitors implementation of corrective actions. • Verifies that system or component tests, equipment and system start-ups, are conducted in the presence of appropriate personnel, and documenting and maintaining records thereof. • Accompanies visiting inspectors representing public, regulatory, or other agencies having jurisdiction over the project. Reports results of these inspections to the WDIG Coordinator, and documents and maintains records thereof. • Reviews and evaluates contractor's suggestions/requests for modifications in Drawings or Specifications. Evaluates, reports and documents suggestions and modifications with the WDIG Coordinator and the Design Engineer.

TABLE 3.1

SUMMARY OF PERSONNEL RESPONSIBILITIES
WDI SITE

POSITION	RESPONSIBILITIES
	• Maintains orderly Site files in accordance with the CQA requirements which contain at least the following categories: - Correspondence - Shop drawings - Engineering drawings - Copies of contractual documents - Work directive modifications/changes (change orders and field orders) - Project reports and meeting reports • Maintains a field log as described in the CQAP. • Records names, contacts, addresses and telephone numbers of all contractors, subcontractors and material suppliers.
Technical Consulting and Project Support Services Personnel	• Reports project concerns to the WDIG Coordinator. • Understands applicable requirements of the CD, AROD, SOW and Remedial Design Plans. • Administers and verifies compliance with QAPP. • Understands and performs project activities according to scope, schedule, and budget. • Understands and performs O&M in accordance with accepted technical and safety procedures. • Performs corrective actions as requested by the WDIG Coordinator. • Prepares and reviews reports required for this project, ensuring technical quality. • Conducts field activities including training of field personnel, sample collection, field measurements and quality control. • Performs data validation procedures (as necessary).
Contractors/ Subcontractors and Material Suppliers	• Follows contract established for the project work. • Understands the Remedial Design Plans construction specifications. • Provides construction and installation services of structures, materials, equipment, and instrumentation as required in the construction specifications design plans. • Provides all original shop drawings, operation manuals, equipment specifications and other related material to the CQA Contractor. • Provides suggestions or requests for modifications in Drawings or Specifications for the design plans to improve the system quality and/or efficiency. • Reviews and understands shop/vendor drawings for equipment and instrumentation required for construction, record date of receipt of shop drawing and provide all originals to the CQA Contractor. • Reviews work in progress for compliance with project schedules with CQA Contractor and WDIG Coordinator.
Project Analytical Laboratories	• Performs all analyses in accordance with requirements of the QAPP and SAP for AROD contaminant constituents according to accepted EPA methods as indicated in the CD, which include methods documented in 40 CFR Part 136 and *Test Methods for Evaluating Solid Waste, Physical/Chemical Methods* (SW-846) and any additions or revisions to these requirements. • Capable of producing submittals of sufficient quality to meet the current requirements for the Contract Laboratory Program Statement of Work for Inorganic Analysis and for Organic Analysis. • Participate in an EPA or EPA-equivalent QA/QC program.

TABLE 3.2
RISKS AND CONTINGENCIES

POTENTIAL REMEDY IMPLEMENTATION RISK	CONCEPTUAL CONTINGENCY PLAN
Construction Contingencies	
Rain occurs during cap construction affecting GCL installation	• Monitor weather forecasts. • Assure that all GCL placed each day is covered with soil, geomembrane or otherwise protected from hydration the same day. • Curtail GCL installation if warranted by threat of rain. • Protect GCL stock. • Cover soil stockpiles prior to rain. • Inspect and maintain erosion and runoff controls. • Remove and replace any GCL in the caps which has become hydrated prior to being covered with geomembrane or soil.
Unanticipated underground utility is encountered	• Perform utility surveys prior to beginning work in an area. • Perform additional check for easements. • Stop work near the utility and prepare corrective action plan (i.e., repair or replacement of broken pipe or conduit, design modification, etc.).
Quality control issues with geosynthetics installation (i.e., high rate of failures for QA testing)	• Conformance samples will be tested prior to installation of materials. • Assure liner subcontractor uses qualified and experienced personnel. • Include contract incentives/ penalties to avoid excessive rework.
Planned production rates (i.e., excavation rate of cover soil) are not met, interfering with other elements of the work (i.e., placement of geosynthetics)	• Consider use of additional crews/equipment, if available. • Consider other means to increase production (i.e., longer work days, adjusted hauling or stockpiling schemes, etc.). • Delay beginning installation of geosynthetics until sufficient excavation has occurred.
Insufficient quantities of geosynthetics are available onsite to complete work	• Perform procurement of geosynthetics and develop delivery schedule prior to initiating construction. • Include incentives/penalties in contracts with liner supplier and/or liner subcontractor to avoid shortages. • Investigate other sources of suitable geosynthetics.
Construction equipment breakdown	• Have mechanic available to bring equipment back into service as soon as possible. • Bring in replacement equipment as necessary. • Consider rental of additional equipment.
Waste is encountered during cover soil excavation	• Follow contingency actions incorporated in the design (i.e., segregate soil, consolidate under RCRA C cap, and construct contingency foundation as necessary to support cap above exposed waste).
Off-site neighbors complain about nuisances (i.e., odors, noise, or dust)	• Mitigate nuisance. • Notify EPA and WDIG Coordinator. • Demonstrate to neighbors the efforts taken to mitigate nuisances and to address their concerns.

TABLE 3.2
RISKS AND CONTINGENCIES
(Continued)

POTENTIAL REMEDY IMPLEMENTATION RISK	CONCEPTUAL CONTINGENCY PLAN
Construction Contingencies (Cont'd)	
Vehicles or other obstacles (i.e., machines or stockpiled products or waste) are impeding implementation	• Work with the tenants and owners to assure that areas and driveways are clear during periods when remedial work has been scheduled. • Attempt to identify the owner and ask the owner to remove the vehicle or obstacle. • If owner cannot move the obstacle, determine if contractor can temporarily move it. • If no owner is identified or if owner indicates the vehicle or obstacle has no value to him, temporarily move it or consider salvage or disposal.
Spill (i.e., of fuel or hydraulic fluid) occurs	• Assure equipment is properly maintained, including periodic inspections. • Implement contractor's spill control and countermeasure plan.
Greater than anticipated volume of debris and rubble is encountered in cover soil excavation, requiring greater volume for disposal and additional import material	• Make adjustments (i.e., in amount of equipment, arrangements with borrow source owner, etc.) to allow increased processing, removal, and import rates if necessary. • Investigate use of crushed rubble as part of soil cover (with approval by Design Engineer/Responsible Charge and EPA). • Investigate adjustment of final grades with Design Engineer/ Responsible Charge, EPA, and property owners to see if adjustments can be made to reduce import requirements.
Schedule Contingencies	
Unusually wet weather conditions occur during construction period	• Protect soil stockpiles and geosynthetics to mitigate damage, erosion and runoff. • Monitor weather and carefully plan construction. • Assure stormwater and erosion control measures are sufficient to protect surface water quality. • Modify schedule as necessary. • Coordinate with neighboring business and school to protect adjacent property as necessary.
Issues related to management plan (i.e., RAWP, CQA Plan, etc.) content cannot be resolved	• Establish what schedule elements, if any, would be affected by the issue and investigate if work can go forward without approval of the particular plan. • Work to resolve issue through compromise and negotiation. • Modify schedule as necessary.
Neighbors or action groups hold demonstrations at the site which inhibit construction	• Notify EPA and WDIG Coordinator. • Obtain assistance from WDIG, EPA, and/or City to address issues of demonstrators. • Improve Site Security (i.e., hire guards, additional protection of equipment, etc.).
Tenant/Owner of a property on perimeter of site that is part of remedial action has an unanticipated issue (i.e., a "busy period") or is uncooperative, potentially upsetting the remedial action schedule	• Attempt to reschedule to work around the issue. • Negotiate with the tenant/owner in attempt to incentivize him to allow completion of the work. • If above actions fail to result in acceptable schedule or work-around, contact WDIG Coordinator and Agency for support. • If Agency cannot resolve issue, propose adjustments to the overall remedial action schedule.

TABLE 3.2
RISKS AND CONTINGENCIES
(Continued)

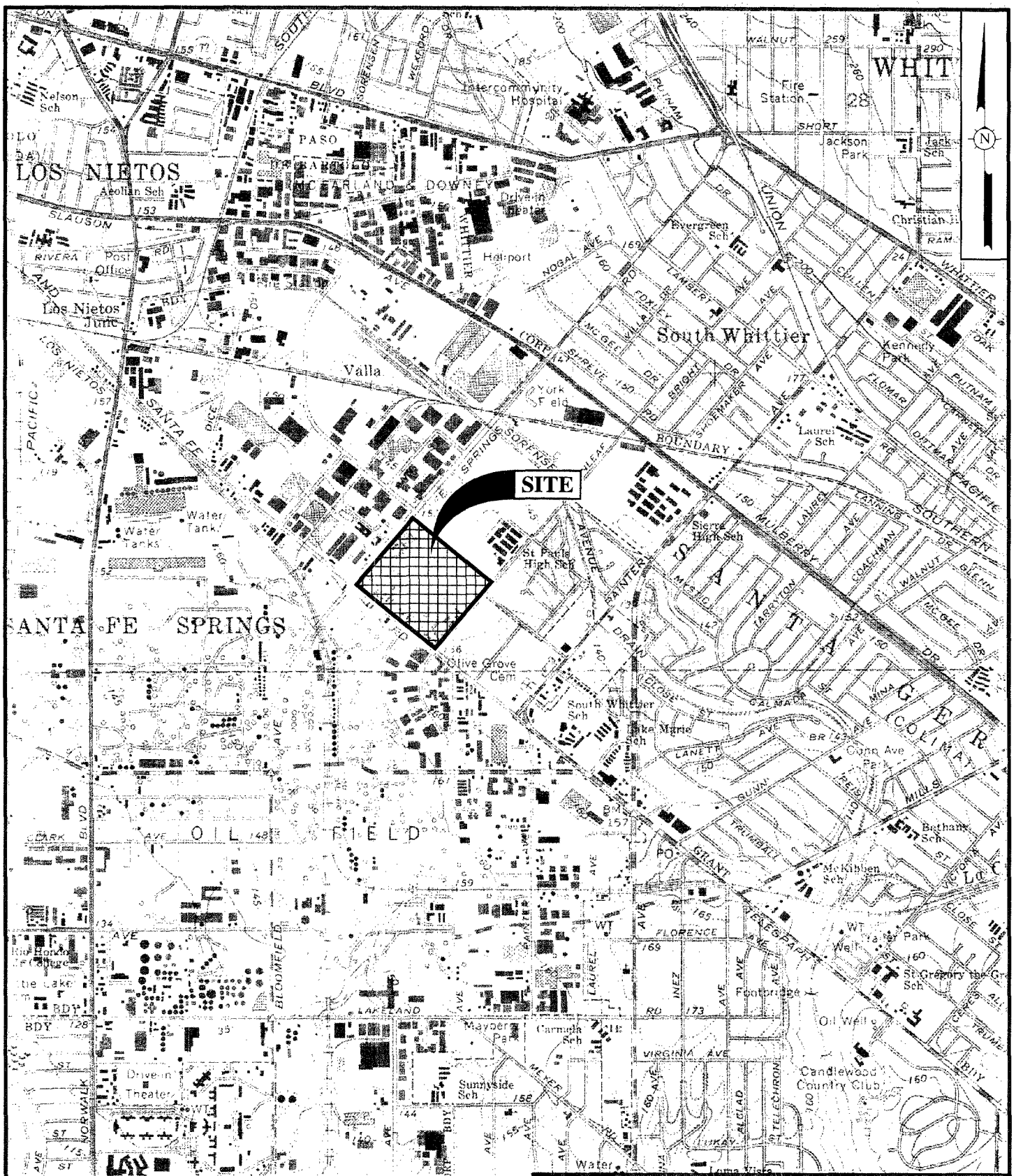
POTENTIAL REMEDY IMPLEMENTATION RISK	CONCEPTUAL CONTINGENCY PLAN
Schedule Contingencies (Cont'd)	
Subcontractor's proposed asphalt mix does not meet performance specification	• Subcontractor investigates other mix designs or pavement sections to meet specification. • Consider other paving subcontractors.
O&M Contingencies	

Unanticipated changes in conditions are observed during ground water or soil gas monitoring	• Implement response plan that will be incorporated into the long-term monitoring plans, which will generally consist of:
	  • Agency notification.
	  • Confirmatory analysis.
	  • Evaluation of likely causes for the change.
	  • Evaluate and select corrective actions, as necessary.
	  • Implement corrective actions (which may include additional engineering controls for buildings in the event of exceedances of health protective levels of soil gas constituents in buildings).

Wells or vapor probes become damaged	• Replace damaged well.
Asphalt or concrete pavement fails sooner than anticipated	• Investigate causes of failure (i.e., poor foundation layer, traffic conditions other than design). • Repair failures in consideration of identified causes.
Power failure shuts down gas venting system	• Gas vent system has autodialer (on battery) to call operator in event of shut down. • Wait until power comes back on. • Go through startup procedure for gas venting system. • Notify agency and note occurrence in operating log.
Landscape vegetation dies	• Replace individual trees or shrubs if within the first year of planting; consider use of alternative species. • Inspect irrigation system to confirm it is working properly and watering all areas. • Remove dead vegetation as part of maintenance.
Theft or vandalism of equipment (i.e., the blower or other equipment on the gas venting system)	• Obtain assistance from the police. • Evaluate potential improvements to site security. • Replace the stolen/vandalized piece of equipment.
Liquids production from the LCPs does not decrease as rapidly as anticipated	• Evaluate liquid collection rates and liquid composition/appearance to establish liquid accumulation rate decrease and determine if liquid composition is changing. • Evaluate alternative sources of liquids (i.e., leaking water or sewer lines, perched water, failure of the cap, etc.).
Unanticipated excessive settlement occurs creating low spots or otherwise affecting drainage or cap performance	• Evaluate Site characterization information to determine causes of excessive settlement. • Develop corrective action plan, which may include filling low spots or reconstruction of areas of cap to reduce strain on the geosynthetics.

Figures

29022401RAWP-09 REV.10/14/03



0 2,000 4,000 FEET

SCALE

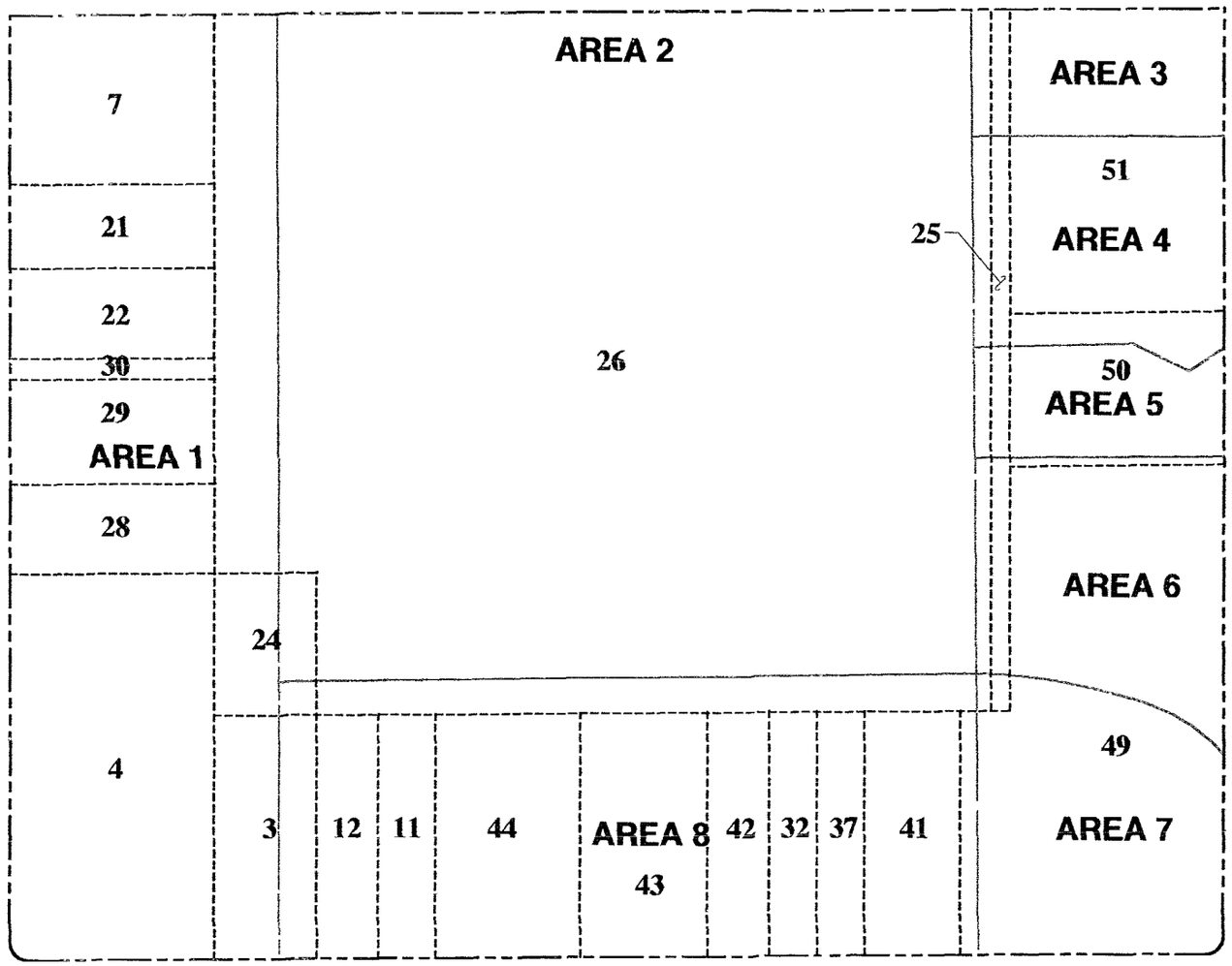
REFERENCE: USGS 7.5 MINUTE TOPOGRAPHIC MAP OF WHITTIER, CALIFORNIA, DATED 1981.

VICINITY MAP

WASTE DISPOSAL, INC.
SANTA FE SPRINGS, CALIFORNIA

TRC

FIGURE 1.1



Map No.	Owner
3	Raymond & Dennis Holbrook Trust
4	Sa-Log Company
7	Eugene and Geraldine Welter Trust
11	JRP, LLC
12	JRP LLC
21	Neville F Ferris Living Trust
22	John I Maple Family Partnership
24	Raymond & Dennis Holbrook Trust
25	Marvin W Pitts and Cecilia Pitts, trustees under Declaration of Trust dated February 1 1982 (Pitts Family Trust), Adeline R Bennet, M D Living Trust
26	Marvin W Pitts and Cecilia Pitts, trustees under Declaration of Trust dated February 1 1982 (Pitts Family Trust), Adeline R Bennet, M D Living Trust
28	Thomas J Mersits, Irene L Mersits Trust
29	Thomas J Mersits, Irene L Mersits Trust
30	Marvin W Pitts and Cecilia Pitts, trustees under Declaration of Trust dated February 1, 1982 (Pitts Family Trust), Adeline R Bennet, M D Living Trust
32	David Joseph Neptune Family Trust
37	Lula Graziano, Trustee of Trust "A" of the Graziano Trust as restated March 4, 1992
	Lula Graziano, Trustee of Trust "A" of the Graziano Trust as restated March 4, 1992
41	Eugene and Geraldine Welter Trust
42	Danny R Peoples & Dena Peoples
43	Eddie Earl Timmons
44	Chasin Trust Hanson Trust, Searing Revocable 1989 Trust
49	Phil Campbell & Diane Cote Family Trust, Gwen Campbell
50	Brothers Machine & Tool, Inc
51	Marvin W Pitts and Cecilia Pitts, trustees under Declaration of Trust dated February 1, 1982 (Pitts Family Trust), Adeline R Bennet, M D Living Trust

LEGEND

- SITE BOUNDARY
- AREA BOUNDARY
- FENCE
- EXISTING BUILDING
- PARCEL BOUNDARY
- 7 PARCEL NUMBER

REFERENCE NUNEZ ENGINEERING, SURVEY DRAWING NF 97187, OCT 31 1997

0 150 300 FEET
SCALE

SITE FEATURES

WASTE DISPOSAL, INC
SANTA FE SPRINGS, CALIFORNIA

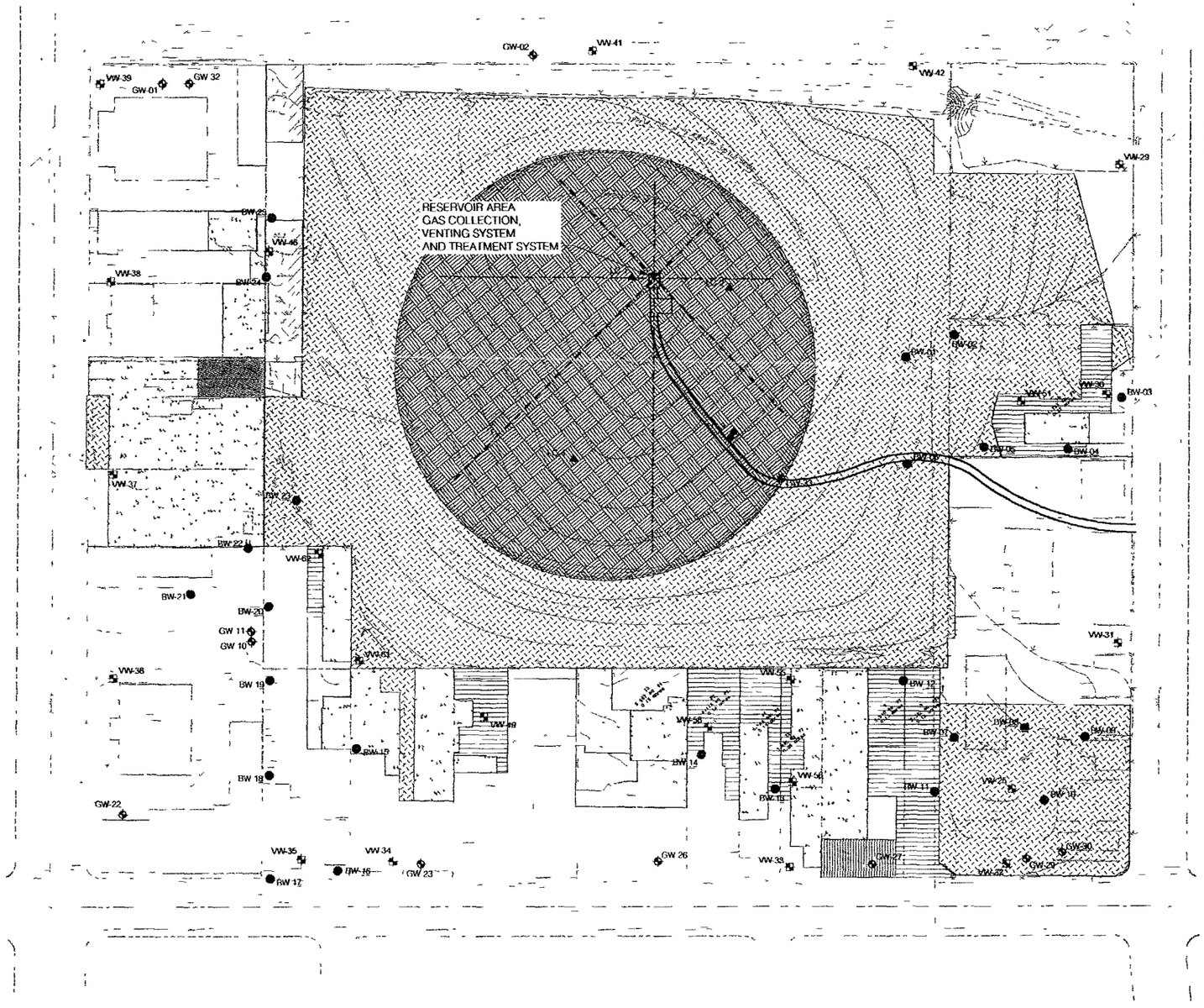
TRC | FIGURE 1.2

PARTIALLY SCANNED
OVERSIZE ITEM(S)

See Document # 2034516
for partially scanned image(s).

For complete version of oversize document(s),
see paper copy.

290224019AWP-C1 REV 10/24/03



LEGEND

- RCRA SUBTITLE C EQUIVALENT CAP AREA
- RCRA SUBTITLE D EQUIVALENT COVER AREA
- REMOVE EXISTING ASPHALT AND REPLACE WITH ENGINEERED ASPHALT COVER
- 2" ASPHALT OVERLAY COVER
- REMOVE EXISTING CONCRETE AND REPLACE WITH ENGINEERED CONCRETE COVER
- ENGINEERED CONCRETE COVER WITH SEALED CRACKS
- SEAL ASPHALT AND RESTRIPE

LEGEND

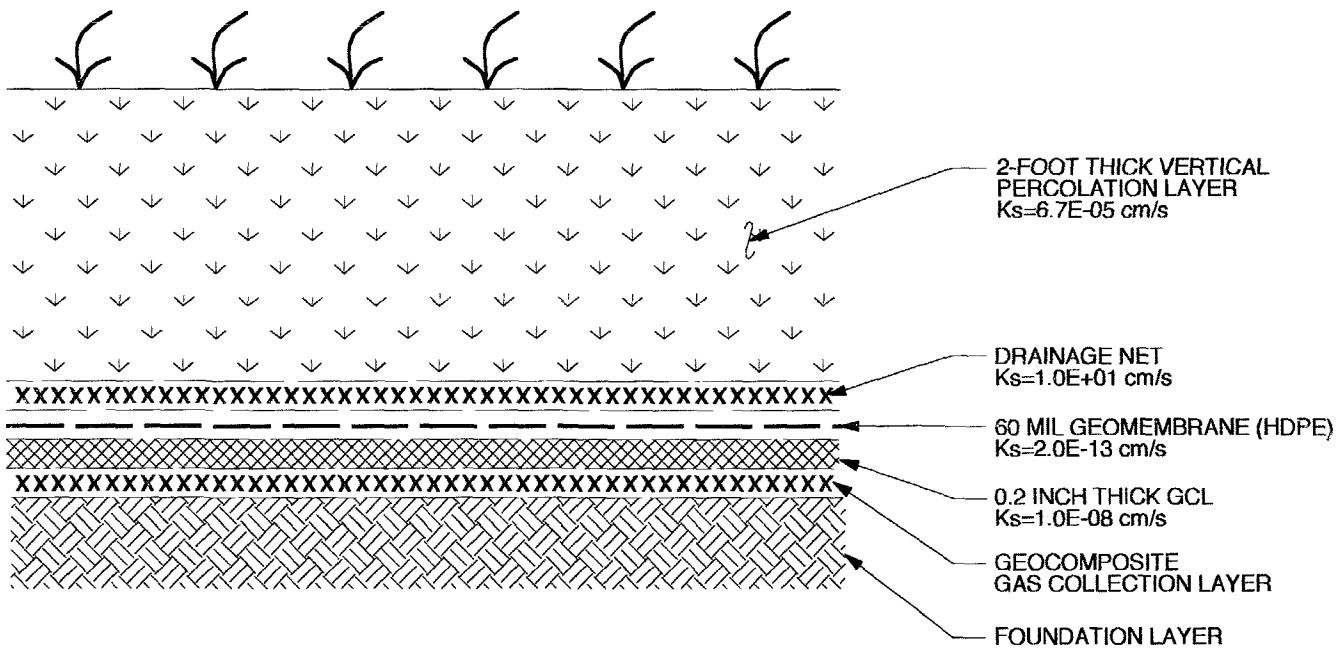
- LIMIT OF WASTE
- LIMIT OF GRADING
- GAS COLLECTION PIPE
- NEW BIOVENT WELL
- EXISTING GROUND WATER WELL TO BE RETAINED FOR MONITORING
- EXISTING VAPOR WELLS TO BE RETAINED FOR MONITORING
- NEW LEACHATE COLLECTION WELLS

0 150 300 FEET
SCALE

MAJOR REMEDY COMPONENTS

WASTE DISPOSAL, INC
SANTA FE SPRINGS, CALIFORNIA

TRC | **FIGURE 2.1**

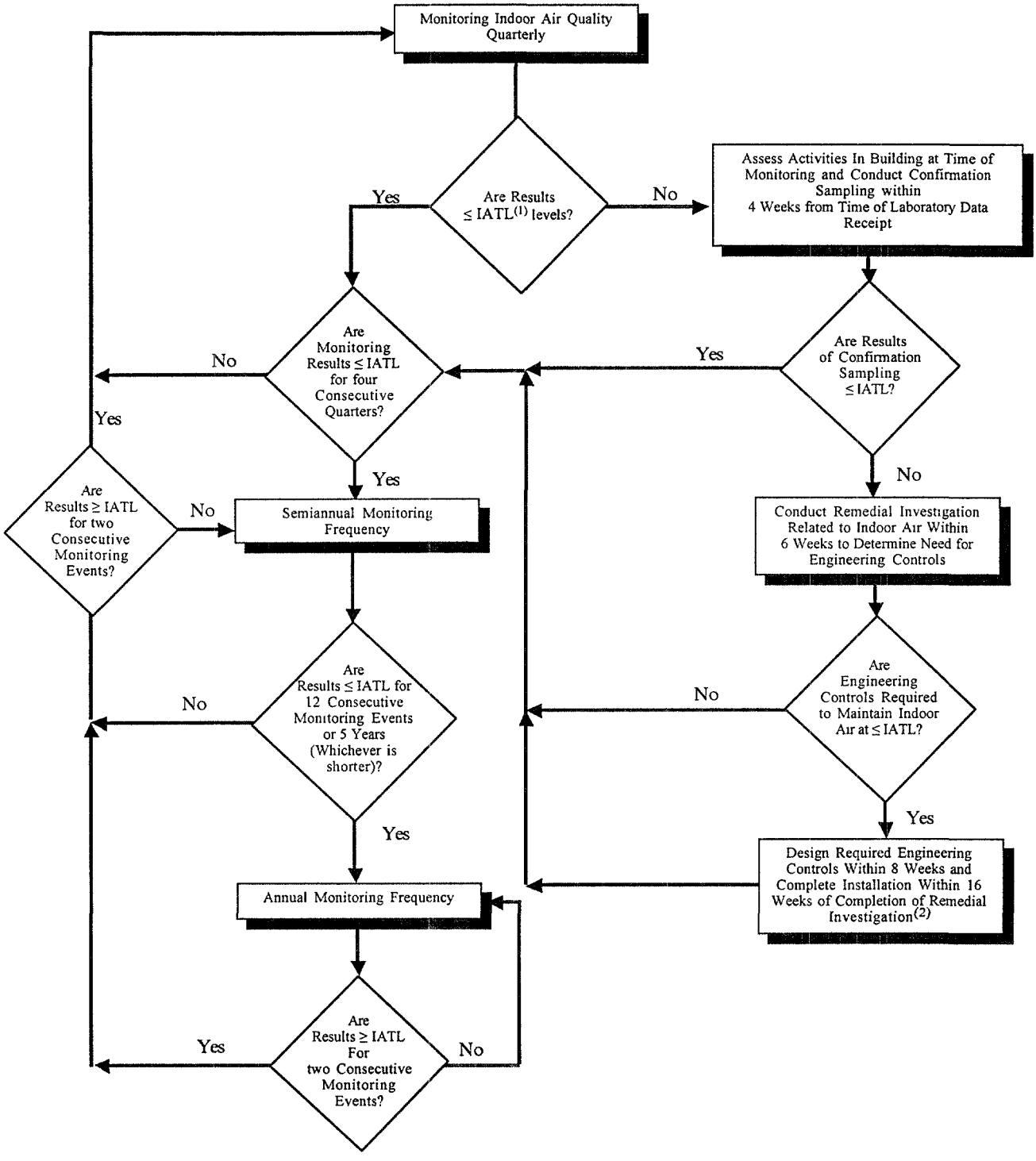


RCRA SUBTITLE C - COVER SYSTEM

WASTE DISPOSAL, INC.
SANTA FE SPRINGS, CALIFORNIA

TRC

FIGURE 2.2

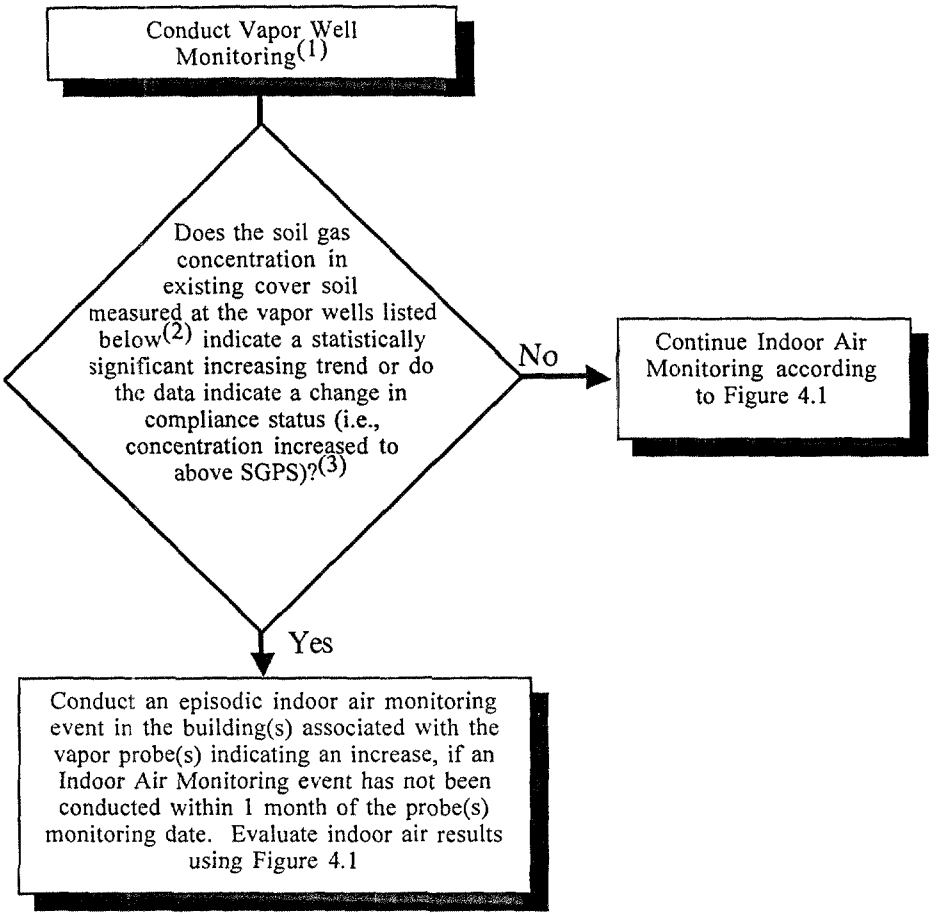


(1) IATL = Indoor Air Threshold Levels (see Table 2.1).
(2) Required engineering controls may include but are not limited to soil vapor extraction system outside building, passive or active foundation vent system, or HVAC system improvements.
3) Final decision matrix will be issued in the OMMP and may include additional actions based on the concentration of the exceedance, e.g., as discussed in the Subsurface Gas Contingency Plan, CDM Federal Programs Corporation, July 17, 1997.

DECISION MATRIX FOR INDOOR AIR MONITORING
(See Footnote 3)

WASTE DISPOSAL, INC.
SANTA FE SPRINGS, CALIFORNIA

TRC | **FIGURE 2.3**



(1) Figure 4.2 is to be used to evaluate vapor probe readings subsequent to cover installation.

(2) The following building(s) are to be monitored for indoor air quality based on the associated probe(s) having a statistically significant increasing trend.

PARCEL NO.	PARCEL ADDRESS	VAPOR WELL NUMBER(4)
021	9620 Santa Fe Springs Road	VW-46
022	9630 Santa Fe Springs Road	VW-46
024	12637 Los Nietos Road	VW-61 and VW-62
003	12635 Los Nietos Road	VW-61
012	12639 Los Nietos Road	VW-60 or VW-61 if VW-60 is abandoned
044	12715-17 Los Nietos Road	VW-49
043	12723 Los Nietos Road	VW-58 and -59
042	12741 Los Nietos Road	VW-58
032	12747 Los Nietos Road	VW-55 and -56
037	12801 Los Nietos Road; 12803 Los Nietos Road	VW-55 and -56
041	12807B, 12807A, 12809, 12811, and 12813 Los Nietos Road	VW-54 or VW-55 and -56 if VW-54 is abandoned
050	9843 Greenleaf Avenue	VW-30 and -51

(3) SGPS = Soil Gas Performance Standard. See Table 2.1.

(4) Only the specific vapor probe installed in existing cover soil will be used in these determinations.

(5) Final decision matrix will be issued in the OMMP and may include additional actions based on the concentration of the exceedance, (e.g., as discussed in the Subsurface Gas Contingency Plan, CDM Federal Programs Corporation, July 17, 1997).

DECISION MATRIX CRITERIA FOR VAPOR PROBE MONITORING DATA
(See Footnote 5)

WASTE DISPOSAL, INC.
SANTA FE SPRINGS, CALIFORNIA

TRC | **FIGURE 2.4**

FIGURE 3,1
PROJECT ORGANIZATION CHART
WDI Superfund Site RA Activities

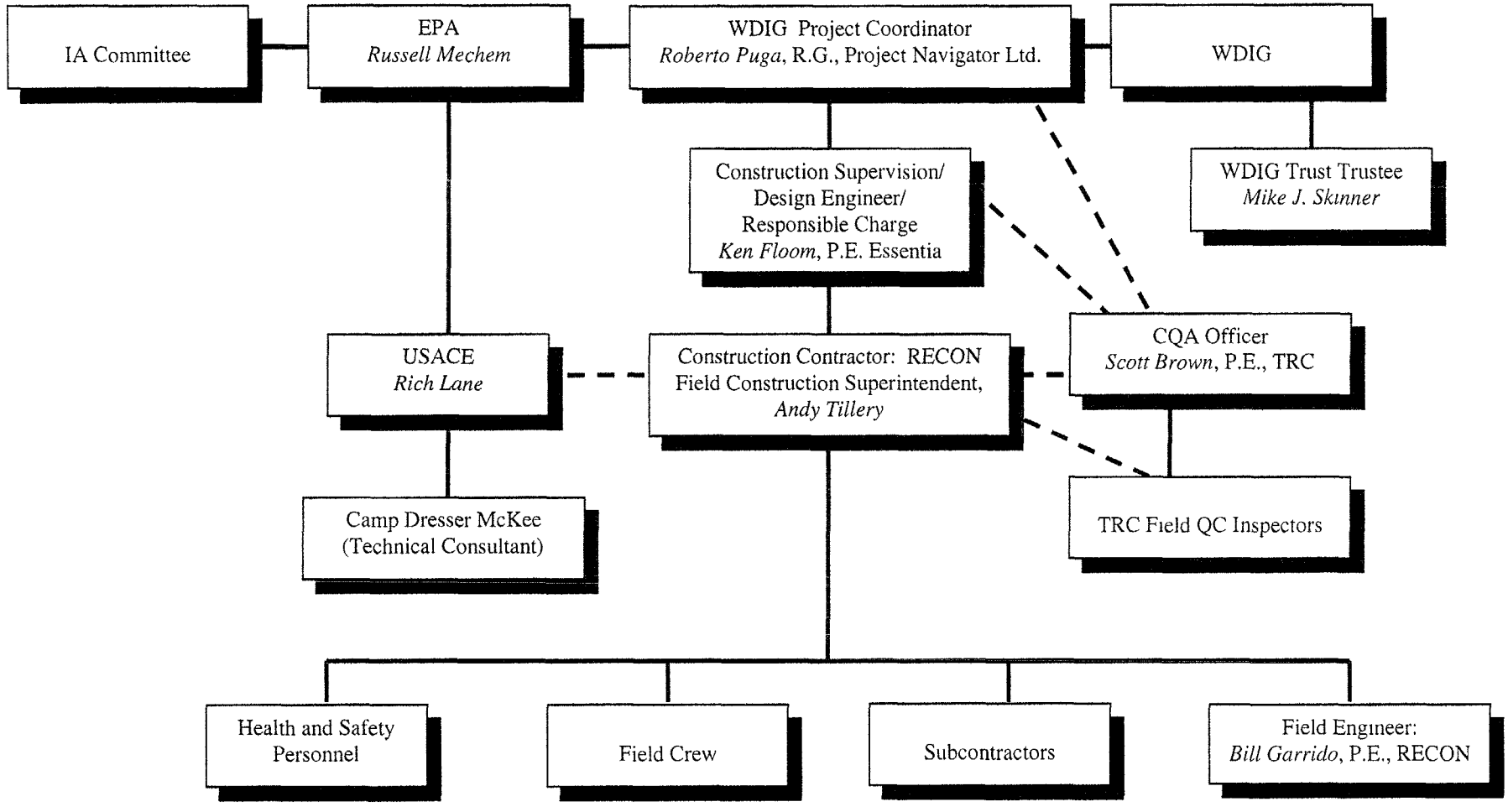


FIGURE 4 1 PROJECT SCHEDULE

WASTE DISPOSAL INC
SANTA FE SPRINGS CALIFORNIA

ID	Task Name	Duration	Start	Finish	Predecessors
1	**WDI Project**	960 days	Fri 9/5/03	Thu 5/10/07	
2	**Transition Activities**	150 days	Thu 12/4/03	Wed 6/30/04	
3	Monitoring	50 days	Thu 12/4/03	Wed 6/30/04	
4	Site Control and Maintenance	150 days	Thu 12/4/03	Wed 6/30/04	3SS
5	Access Agreements	6 days	Thu 12/4/03	Thu 12/11/03	3SS
6	**Community Relations**	69 days	Mon 12/8/03	Thu 3/11/04	3SS
7	Pre Construction Meetings with Landowners and Tenants	2 days	Mon 12/8/03	Tue 12/9/03	
8	Fact Sheet Preparation	19 days	Mon 1/26/04	Thu 2/19/04	
9	Fact Sheet Release	1 day	Fri 2/20/04	Fri 2/20/04	8
10	Press Release	1 day	Wed 3/10/04	Wed 3/10/04	
11	Media Availability Session	1 day	Thu 3/11/04	Thu 3/11/04	10
12	Public Meeting/Open House	1 day	Tue 3/2/04	Tue 3/2/04	
13	**Management Plans**	960 days	Fri 9/5/03	Thu 5/10/07	
14	RA Contract Award	1 day	Fri 9/5/03	Fri 9/5/03	
15	RAWP	61 days	Fri 12/5/03	Fri 2/27/04	
16	Finalize Remedial Action Work Plan (RAWP)	4 days	Fri 12/5/03	Fri 1/30/04	4SS
17	Agency review and approval of Final RAWP	20 days	Mon 2/2/04	Fri 2/27/04	16
18	CQAP	41 days	Mon 12/1/03	Mon 1/26/04	
19	Finalize CQA Plan	32 days	Mon 12/1/03	Tue 1/13/04	
20	Agency review and approval of CQAP	9 days	Wed 1/14/04	Mon 1/26/04	9
21	QAPP and SAP	45 days	Mon 12/15/03	Fri 2/13/04	
22	Finalize QAPP and SAP	32 days	Mon 12/15/03	Tue 1/27/04	
23	Agency review and approval of Final QAPP and SAP	13 days	Wed 1/28/04	Fri 2/13/04	22
24	HASP	82 days	Mon 10/13/03	Tue 2/3/04	
25	Finalize HASP	78 days	Mon 10/13/03	Wed 1/28/04	
6	Agency review and approval	4 days	Thu 1/29/04	Tue 2/3/04	25
27	**O&M Plan**	66 days	Thu 4/1/04	Thu 7/1/04	
28	O&M Plan Meeting	1 day	Thu 4/1/04	Thu 4/1/04	
29	Prepare and submit Prefinal O&M Plan	20 days	Fri 4/2/04	Thu 4/29/04	28
30	Prepare and submit Prefinal Long-term Monitoring Plans	20 days	Fri 4/2/04	Thu 4/29/04	28
31	Agency review and comment on Prefinal O&M Plan and Long-term Monitoring Plans	1 days	Fri 4/30/04	Thu 5/20/04	30 29
32	Prepare and submit Final O&M Plan	20 days	Fri 5/21/04	Thu 6/17/04	31
33	Prepare and submit Final Long-term Monitoring Plans	20 days	Fri 5/21/04	Thu 6/17/04	31
34	Agency review and approval of Final O&M Plan and Long-term Monitoring Plans	10 days	Fri 6/18/04	Thu 7/1/04	33 32
35	**Progress Reports (construction)**	176 days	Mon 11/10/03	Mon 7/12/04	
45	**Progress Reports (O&M)**	718 days	Tue 8/10/04	Thu 5/10/07	
58	**General Construction Preparation**	104 days	Fri 2/6/04	Wed 6/30/04	
59	Pre-Construction Meeting	1 day	Fri 2/6/04	Fri 2/6/04	
60	Early Field Mobilization	8 days	Wed 2/25/04	Fri 3/5/04	5 3days
61	Site Preparation	8 days	Mon 3/8/04	Wed 3/17/04	59SS 12SS 4 days
62	Purchasing	15 days	Mon 3/1/04	Fri 3/19/04	17
63	Removal of Concrete Slabs	7 days	Thu 3/18/04	Fri 3/26/04	61
64	Fencing	38 days	Fri 4/23/04	Tue 6/15/04	10FF
65	RV Storage Yard Asphalt Removal	4 days	Mon 3/29/04	Thu 4/1/04	63
66	Security	83 days	Mon 3/8/04	Wed 6/30/04	59
67	**RCRA "D" Equivalent Cap**	64 days	Mon 3/29/04	Thu 6/24/04	
68	RCRA "D" Equivalent Cap Subgrade Excavation	21 days	Mon 3/29/04	Mon 4/26/04	63
69	RCRA "D" Equivalent Cap Abandonment of Existing Monitoring Wells	5 days	Mon 3/29/04	Fri 4/2/04	68SS
70	RCRA "D" Equivalent Cap Exposed Waste Procedure	10 days	Mon 3/29/04	Fri 4/9/04	68SS
	Soil Gas Control System Electrical Conduit Trench	4 days	Tue 4/20/04	Fri 4/23/04	81SS+10 days
72	Soil Gas Control System Conduits	4 days	Tue 4/20/04	Fri 4/23/04	71SS

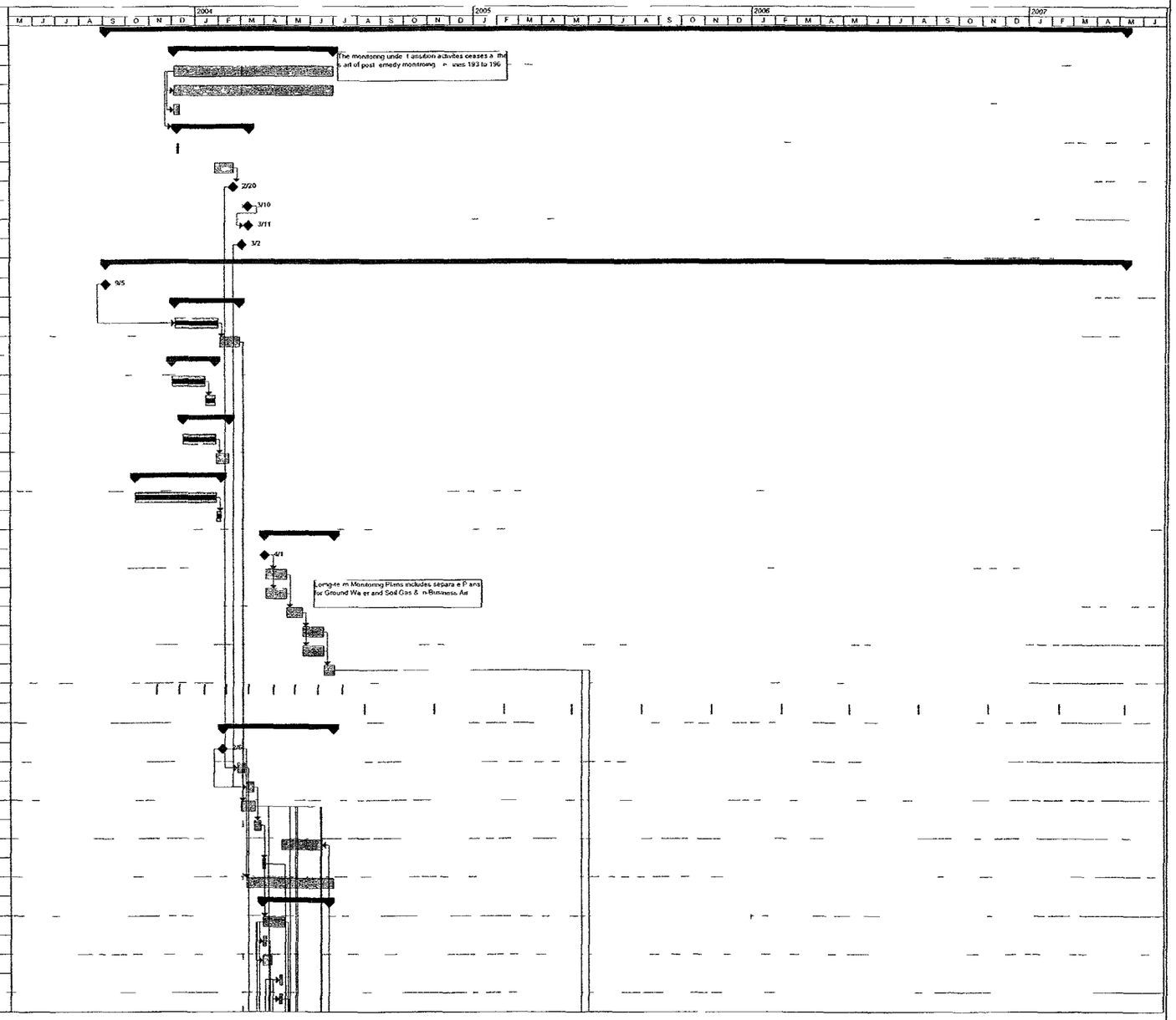


FIGURE 4 1 PROJECT SCHEDULE
WASTE DISPOSAI INC
SANTA FE SPRINGS CALIFORNIA

D	Task Name	Dur ion	S art	F nish	Predecessors
3	So Ga Cont o System Me a Loca S ip	1 day	Fn 4 23/04	Fn 4/23/04	72FF
74	RCRA C Equiva ent ap D ainage Trench E cava ion	3 days	Tue 4/20/04	Thu 4/22/04	2SS
5	RCRA C Equ alent ap D a nag T nch 4 So id PVC Pipe	2 days	Fn 4/23/04	Mon 4/26/04	74
76	RCRA Fquivale Cap Drainage T ench Ba k ll	2 days	Tue 4 27 04	Wed 4 28/04	5
7	RCRA D Equ alen Cap Fine G ad ng	4 days	Tue 3/30/04	Fn 4 6/04	68SS 1 day
78	RCRA D Equivalent Cap Ancho T ench Exca a ion	2 days	Tue 4/6 04	Wed 4/7/04	80SS
9	RCRA D Equivalent Cap Cu hion Ce e le	5 days	ue 4/6 04	Mon 4/26/0	0SS 62
80	RCRA D Equ alent Cap Geosyn he Clay La e	15 days	Tue 4/6/04	Mon 4 26/04	77SS 5 days 62
81	RCRA D Equ alent Cap Vege a ion La er	20 days	ue 4/6 04	Mon 5/3/04	79SS
82	RCRA D Equ alent Cap nstall Vege a ion	2 days	W d 6 23/04	Thu 6/24/04	2
83	mport Soil Identifica ion and es ing	5 days	Mon 4/5/04	Fn 4/23/04	68SS 5 days
84	RCRA D Equ a nt Cap mp rt Soil	8 days	Mon 4/26/04	Wed 5/5/04	8 FF 2 days 83
85	Ex ing Paving Areas Remove E isting Paving and Replace wit Eng nee ed Asphalt Cove	21 days	Tue 3/30/04	Tue 4/27/04	68SS 1 day
86	E isting Paving A eas 2" Asphalt Ove lay C ve	4 days	Wed 4/28/04	Mon 5/17 04	85
8	Existing Pa ing Areas Remo e E sting Concre e and Replace with Enginee ed Concre e Co e	11 days	Tue 5/ 8/04	Tue 6 1/04	86
88	E s ing Pa ing A eas Seal Asphalt and Rest pe	3 days	Wed 6 2/04	Fn 6 4/04	8
89	**RCRA C Equiva en Cap**	**63 days**	**Mon 4/5/04**	**Wed 6/30/04**	
90	RCRA C Equ alent Cap Abandonment o E isting Monitoring Wells	0 days	Mon 4/5/04	Fn 4/16/04	69
91	RCRA C Eq iva ent Cap S bgrade E ca ation	5 d ys	Wed 4 28/04	T e 5 8/04	68FS day
92	RCRA C Equ alent Cap E posed W a e Proced e	5 da s	W d 4/28/04	Tue 5/4/04	9 SS
93	RCRA Equ alen Cap Soil Gas Con o Sys em T enching	8 da s	Thu 4/29 04	Mo 5/ 0/04	91SS 1 day
94	RCRA C Equ alent Cap Soi Gas Co o ys em 2 PVC P rfora ed Pipe	8 d ys	Thu 4 29 04	Mon 5/ 0/04	93SS
95	RCRA C Equ alent Cap Soil as Co ol Sys em G ave Ba kfill	8 days	Thu 4 29 04	Mon 10/04	94SS
96	RCRA C Equ alent ap F ne G ading	0 days	Fn 4 30/04	Thu 5/13/04	95SS 1 day
9	CRA C Equ alent Cap Soil Gas Con o System Ceocomposite Ge Collection La ye	2 days	ue 5/ 1 04	Tue 6/8/04	95
98	RCRA C Equ alent Cap Geosyn he Clay Layer	21 days	Wed 5 2/04	Wed 6/9/04	97SS 1 day 62
99	RCRA C Equ alent Cap HDPE Geomembrane Ba ie Laye	21 days	Wed 5/ 2/04	Wed 6/9 04	98SS 62
00	RCRA C Equ alent Cap Geocomposite Drainage Laye	21 days	Fn 5/ 4/04	Fn 6 /04	99SS 2 days 62
101	RCRA C Equivalent Cap Anchor Trench Geotextile Filte	2 days	Mon 6 14 04	Tue 6/ 5.04	00,62
02	RCRA C Equ alent Cap Anchor T ench 4 Perfo a ed Collection P pe	10 days	Wed 6 6/04	Tue 6/29/04	10
0	RCRA C Equ alent Cap An ho T ench Gravel Ba kfil	8 days	Fn 6/18/04	Tue 6 29/04	02SS 2 days
04	RCRA C Equivalent Cap Anchor ench Me a Lo ato Strip	1 day	Wed 6 30/04	Wed 6 30/04	103
05	RCRA C Equivalent Cap Vege a ive Soil Layer	20 days	Tue 5/ 8/04	Mon 6 14/04	00SS 2 days
106	RCRA C Equivalent Cap nstall Vege a ion	3 days	Tue 6/22/04	Thu 6/24 04	1 2
107	RCRA C Equivalent Cap mport Fill	8 days	Fn 6 4/04	Tue 6/ 5/04	05FF 1 day
08	**Gas Control System (System Start-up)**	**27 days**	**Tue 6/15/04**	**Wed 7/21/04**	
09	RCRA C Equivalent Cap Soil Gas Control Sys em Gas Collection Venting and Trea ment System and Pad	20 days	Tue 6/15/04	Mon 7 2/04	05 62
110	RCRA C Equivalent Cap Soil Gas Con o Sys em Gas Collection Venting and Treatment System Sys em Startup	5 days	Tue 7 13/04	Mon 7 19/04	09
	RC C Eq ivalent Cap Soil Gas C n rol Sy n Gas Collection Vent ng and Treatment System Fence	2 d ys	Tue 7/20/04	Wed /21/04	1 0
112	RCRA C Equivale t Cap Soil Gas Con ro System Access Road	4 days	Wed 6 16/04	Mon 6/2 /04	10
3	**Reservoir Leachate Co lection Po n s**	3 days	Wed 6/ 6/04	Fn 6/ 8/04	1 2SS
1 4	**Pe imeter Passive Gas Control System**	7 days	Mon 6/21 04	Tue 6/29 04	1 3
15	**Settlement Monuments**	2 days	Wed 6/16/04	Thu 6/17/04	107
1 6	**Surface Wa er Con rols**	**68 days**	**Tue 3/23/04**	**Thu 6/24/04**	
1 7	Surface Wa e Controls Ca ch Basin	day	Tue 5/4/04	Tue 5/4/04	81 62
118	Surfa e Wa e Controls nstall 6 PVC S orm Drain	2 days	Tue 5/4 04	Wed 5/5/04	1 7SS 62
19	Surface Wa e Controls n all Drain ge Swales	14 days	Tue 5/4/04	Fn 5/21/04	118SS
20	Surface Wa e Con rols nstall V Ditch	3 days	Mon 5/24/04	Wed 5/26/04	1 9
121	**Construction Storm Wa e Management**	68 days	T e 3/2 /04	Thu 6/24/04	106FF
122	**Landscaping**	**22 days**	**Tue 6/15/04**	**Wed 7 14/04**	
123	ns all rrigation System	0 days	Tue 6/15/04	Mon 6/28/04	105 84SS day 62

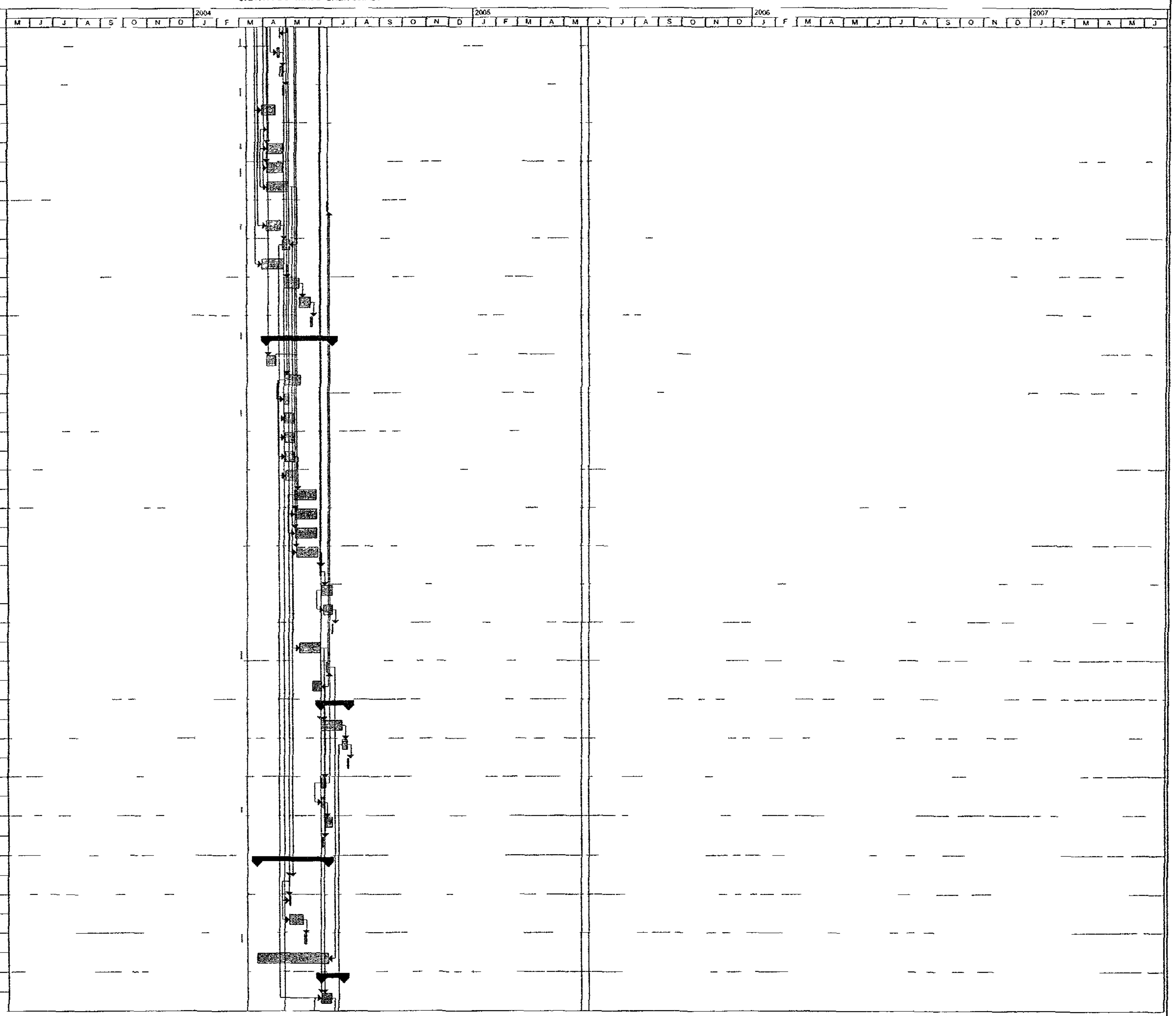


FIGURE 4 1 PROJECT SCHEDULE

WASTE DISPOS AL INC
SANTA FF SPRINGS CALIFORNIA

ID	Task Name	Duration	Start	Finish	Predecessors
74	Landscaping T ees	12 days	Tue 6/29/04	Wed 7 14/04	123
25	Landscaping Shrubs	12 days	Tue 6/29/04	Wed 7 14/04	124SS
126	Landscaping Ground Cove	12 day-	Tue 6/29/04	Wed 7 14/04	125SS
127	Landscaping Mulch	12 days	Tue 6/29/04	Wed 7 14/04	126SS
128	Landscaping Stray Bail Fence	8 days	Tue 6/15/04	Thu 6/24/04	123SS
129	*Occupied Parcel Remedial Activities*	82 days	Mon 3/8/04	Tue 6/29/04	
130	Parcel #50	27 days	Mon 3/8/04	ue 4/13/04	
131	Move Fence	2 days	Mon 3/8/04	Tue 3/9/04	60
132	Surface P epa ation Work	2 days	Mon 3/8/04	Tue 3/9/04	60
133	Mobilize special forklift for equipment	2 days	Wed 3/10/04	Thu 3/11/04	132
134	Brother's personnel to relocate yard equipment	3 days	Fri 3/12/04	Tue 3/16/04	133
135	Remove exis ng surface and prepa e subg ade	5 days	Wed 3/17/04	Tue 3/23/04	134
136	Shallow waste removal	5 days	Wed 3/17/04	Tue 3/23/04	134
137	Install RCRA D Cover	6 days	Wed 3/24/04	Wed 3/31/04	136
138	Replace asphalt/concrete	4 days	Thu 4 1/04	Tue 4/6/04	137
139	Seal interior floor slab	2 days	Wed 3/17 04	Thu 3/18/04	134
140	Bro her's personnel to eplace yard equipment	3 days	Wed 4/7/04	Fri 4/9/04	138
141	Replace fence	2 days	Mon 4/ 2/04	Tue 4/13/04	140
142	Parcel #41	20 days	Mon 3/8/04	Fri 4/2/04	
143	Site Prepa ation (Tenants clea yard)	4 days	Mon 3/8/04	Thu 3/11/04	60
44	Remove and replace asphalt (First half ove weekend))	2 days	Fri 3/12/04	Mon 3/ 5/04	143
145	Seal Interior Floor slabs (weekend work)	5 days	Tue 3/16/04	Mon 3/22/04	144
146	Remove and replace asphalt (Second half)	4 days	Tue 3/23/04	Fri 3/26/04	145
147	Side gutter (not on critical path)	2 days	Thu 4/1/04	Fri 4/2/04	
48	Parcel #37/32	10 days	Mon 3/8/04	Fri 3/19/04	
49	Site Preparation	5 days	Mon 3/8/04	Fri 3/12/04	60
150	Remove and replace asphalt	5 days	Mon 3/15/04	Fri 3/19/04	149
151	Seal interio floo slab	5 days	Mon 3/15/04	Fri 3/19/04	149
152	Parcel #42	10 days	Mon 3/15/04	Fr 3/26/04	
153	Site preparation	5 days	Mon 3/15/04	Fri 3/19/04	149
154	*Remove and replace asphalt*	5 days	Mon 3/22/04	Fri 3/26/04	153
155	Parcel #44	8 days	Mon 3/15/04	Wed 3/24/04	
156	Site prepa ation	5 days	Mon 3/15/04	Fri 3/19/04	149
157	Remove and replace asphalt	3 days	Mon 3/22/04	Wed 3/24/04	156
158	*Seal interior floor slab*	3 days	Mon 3/22/04	Wed 3/24/04	156
159	Parcel #11/12	11 days	Mon 3/15/04	Mon 3/29/04	
160	Site preparation	5 days	Mon 3/15/04	Fri 3/19/04	149
161	Sea existing concrete	2 days	Mon 3/22/04	Tue 3/23/04	160
162	Install asphalt/concrete	4 days	Wed 3/24/04	Mon 3/29/04	161
163	Parcel #3	10 days	Mon 3/22/04	Fri 4/2/04	
164	Site preparation	5 days	Mon 3/22/04	Fri 3/26/04	160
165	Remove and replace concrete	5 days	Mon 3/29/04	Fri 4/2/04	164
166	Seal interior floor slabs	3 days	Mon 3/29/04	Wed 3/31/04	164
167	Parcel #24	12 days	Mon 3/29/04	Tue 4/13/04	
168	Site preparation	4 days	Mon 3/29/04	Thu 4/1/04	164
169	Remove and replace asphalt (weekend)	2 days	Fri 4/2/04	Mon 4/5/04	168
170	*Seal interior floor slabs (weekend)*	2 days	Fri 4/2/04	Mon 4/5/04	168
171	Asphalt overlay	6 days	Tue 4/6/04	Tue 4/13/04	170
172	Parcel #28/29	63 days	Fri 4/2/04	Tue 6/29/04	
73	Site preparation	5 days	Fri 4/2/04	Thu 4/8/04	168
174	Seal concrete	5 days	Fri 4/9/04	Thu 4 15/04	173

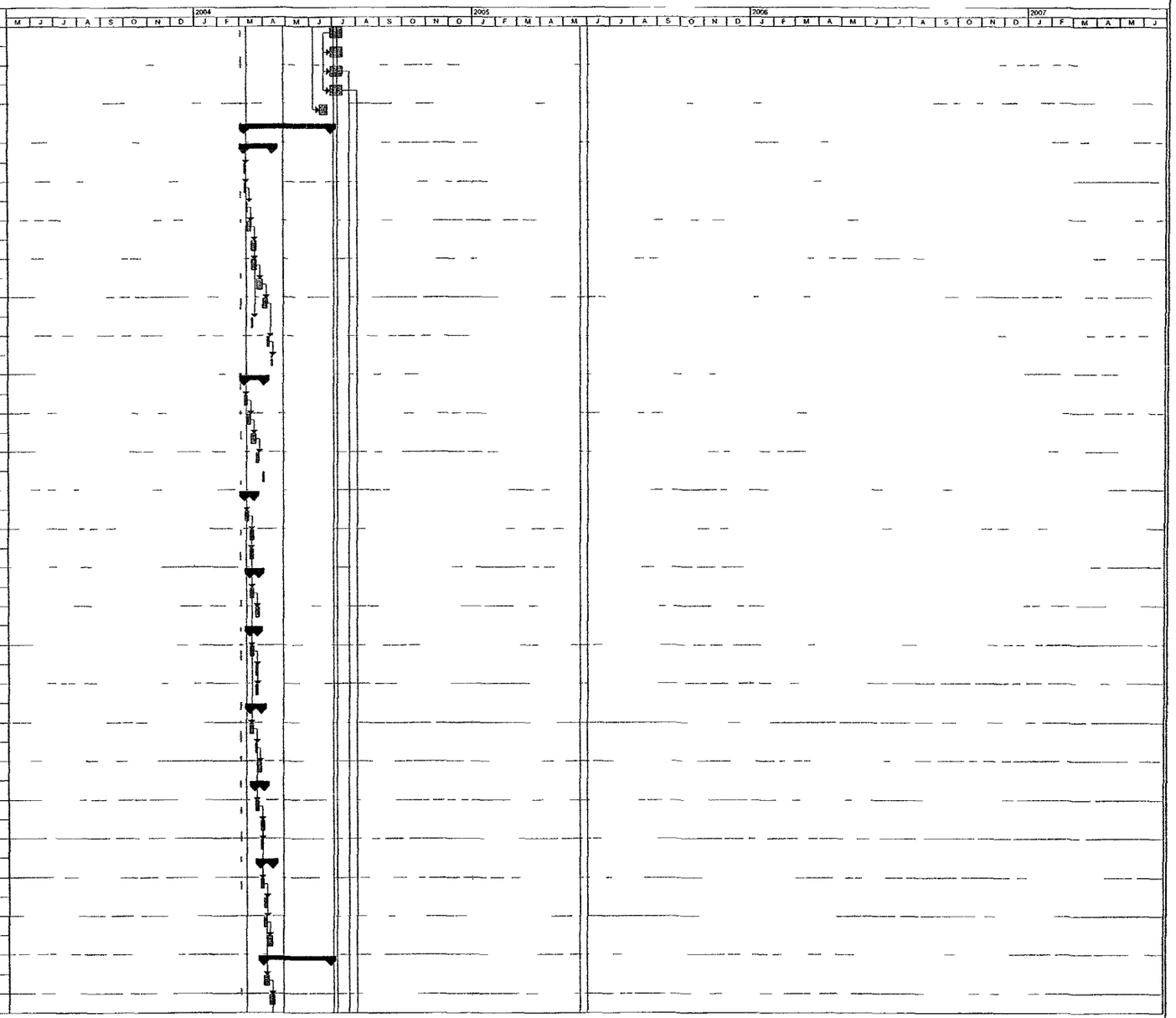
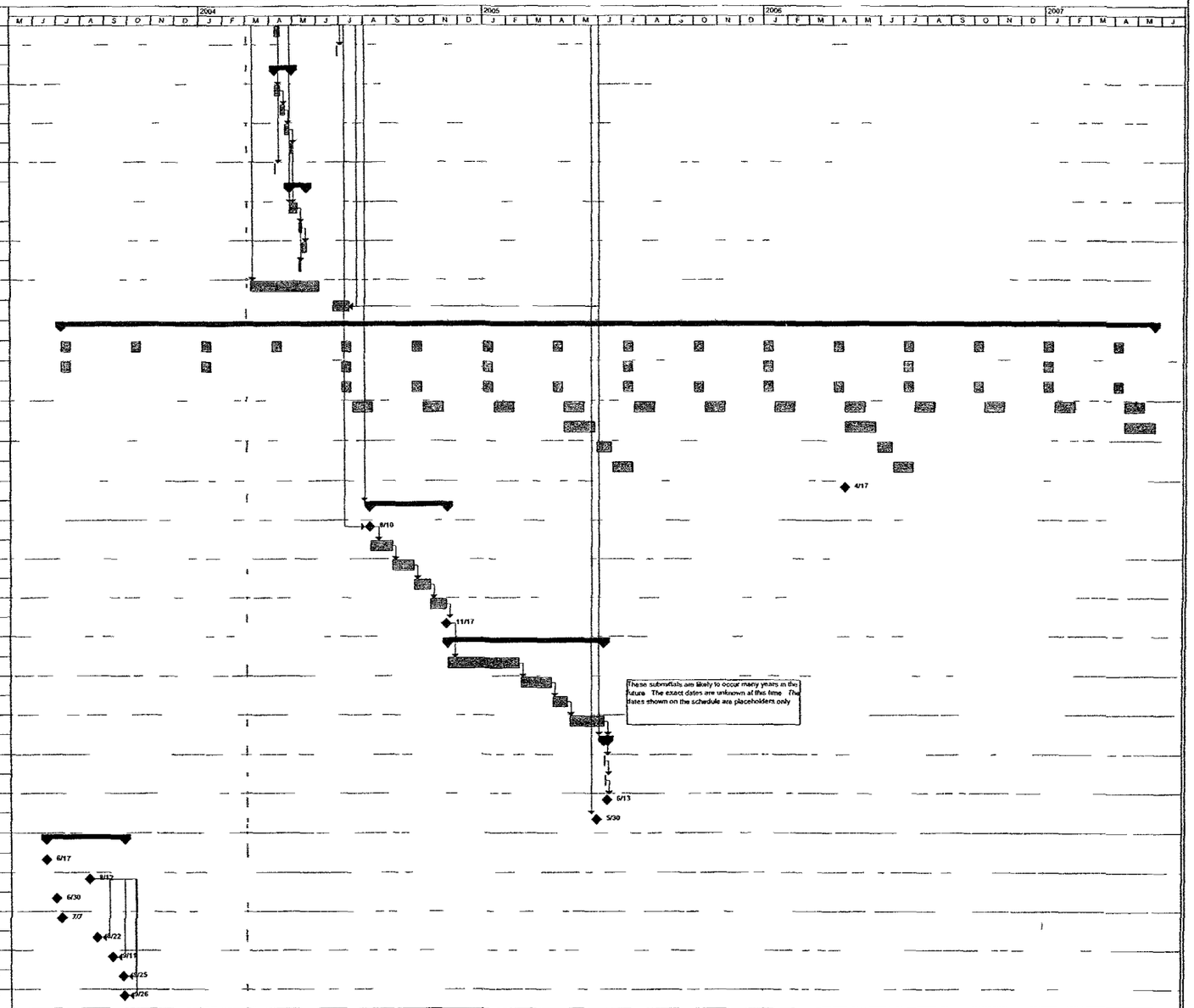


FIGURE 4 1 PROJECT SCHEDULE

WASTE DISPOSAL, INC
SANTA FE SPRINGS CALIFORNIA

ID	Task Name	Duration	Start	Finish	Predecessors
75	Install RCRA Cover on Parcel #29	5 days	Fri 4/9/04	Thu 4/15/04	173
176	Replace tree	1 day	Tue 6/29/04	Tue 6/29/04	123
177	Parcel #43	16 days	Fri 4/9/04	Fri 4/30/04	
8	Site preparation	5 days	Fri 4/9/04	Thu 4/15/04	173
179	Remove and replace asphalt	4 days	Fri 4/16/04	Wed 4/21/04	178
180	Overlay asphalt	4 days	Thu 4/22/04	Tue 4/27/04	179
181	Seal interior floor slabs	3 days	Wed 4/28/04	Fri 4/30/04	180
182	Tree removal	1 day	Fri 4/9/04	Fri 4/9/04	173
183	Parcel #21/23/26/30	16 days	Wed 4/28/04	Wed 5/19/04	
184	Site preparation container moving	8 days	Wed 4/28/04	Fri 5/7/04	180,65
185	Overlay asphalt	4 days	Mon 5/10/04	Thu 5/13/04	84
186	Remove and replace concrete	4 days	Fri 5/14/04	Wed 5/19/04	185
187	Seal interior floor slabs	3 days	Mon 5/10/04	Wed 5/12/04	184
88	Well Installations BW-02 to BW 24	65 days	Mon 3/8/04	Fri 6/4/04	60
189	Demobilization	15 days	Thu 6/24/04	Wed 7/14/04	126FF
190	Initiate O&M Activities	1015 days	Mon 7/7/03	Fri 5/25/07	
9	Institutional Controls Monitoring	985 days	Mon 7/7/03	Fri 4/13/07	
208	Ground Water Monitoring	920 days	Mon 7/7/03	Fri 1/12/07	
217	In-Business Air and Soil Gas Monitoring	725 days	Mon 7/5/04	Fri 4/13/07	
230	Ground Water Soil Gas and In-business Air Monitoring and Data Reports Preparation and Submission	735 days	Mon 7/19/04	Fri 5/11/07	
243	Draft Annual Ground Water Soil Gas and In-business Monitoring and Evaluation Report Preparation and Submission	550 days	Mon 4/18/05	Fri 5/25/07	
247	Agency Review of Annual Monitoring and Evaluation Reports	275 days	Mon 5/30/05	Fri 6/16/06	
250	Final Annual Ground Water Soil Gas and In-business Air Monitoring and Evaluation Report Preparation and Submission	280 days	Mon 6/20/05	Fri 7/14/06	
253	*Prepare Bi-annual Update of the Institutional Controls Enforcement Work Plan*	1 day	Mon 4/17/06	Mon 4/17/06	
254	Construction As-Built Report and Compliance Testing Plan	72 days	Tue 8/10/04	Wed 11/17/04	127
3	Construction As Built Meeting	1 day	Tue 8/10/04	Tue 8/10/04	110SS 20 days
256	Prelimal As-Built Report and Compliance Testing Plan	20 days	Wed 8/11/04	Tue 9/7/04	255
257	Agency review	20 days	Wed 9/8/04	Tue 10/5/04	256
258	Final Construction As Built Report and Compliance Testing Plan	5 days	Wed 10/6/04	Tue 10/26/04	257
259	Agency review and approval	15 days	Wed 10/27/04	Tue 11/16/04	258
260	Compliance Testing Request	1 day	Wed 11/17/04	Wed 11/17/04	259
261	Compliance Testing Period(s)	144 days	Fri 11/19/04	Wed 6/8/05	
262	First Compliance Testing Period	66 days	Fri 11/19/04	Fri 2/18/05	260
263	Compliance Testing Report preparation and submission	30 days	Mon 2/21/05	Fri 4/1/05	262
264	Agency review and notice of successful completion of compliance testing	15 days	Mon 4/4/05	Fri 4/22/05	263
265	Construction Completion Report preparation and submission (if required by EPA)	32 days	Tue 4/26/05	Wed 6/8/05	264
266	Remedial Action Completion Submittals (as required)	3 days	Thu 6/9/05	Mon 6/13/05	189,34,265
267	RA Pre-Certification Inspection	1 day	Thu 6/9/05	Thu 6/9/05	265
268	Remedial Action Completion Report Preparation and Submittal	1 day	Fri 6/10/05	Fri 6/10/05	267
269	EPA Notification of Certification of Completion of Remedial Action	1 day	Mon 6/13/05	Mon 6/13/05	268
270	Annual and five-year work status report submittals (as required)	1 day	Mon 5/30/05	Mon 5/30/05	189,34,244
271	Consent Decree Non-Technical Requirements	74 days	Tue 6/17/03	Fri 9/26/03	
272	Remedial Design Approved	1 day	Tue 6/17/03	Tue 6/17/03	
273	Consent Decree Officially Entered	1 day	Tue 8/12/03	Tue 8/12/03	
274	Notification of Potential Supervising Contractor	1 day	Mon 6/30/03	Mon 6/30/03	
275	Notification of Project Coordinator	1 day	Mon 7/7/03	Mon 7/7/03	
276	Submit Fully Executed Trust Agreement	1 day	Fri 8/22/03	Fri 8/22/03	273FF 8 days
277	Submit Assurance of Ability to Complete Work	1 day	Thu 9/11/03	Thu 9/11/03	273FF 22 days
278	Submit Payment for Past Response Costs	1 day	Thu 9/25/03	Thu 9/25/03	273FF+32 days
	Submit Owner and Defendant ERC and Insurance	1 day	Fri 9/26/03	Fri 9/26/03	273FF 33 days



APPENDIX A

PROJECT PROCEDURES MANUAL

A.1 Contingency Design Procedures
A.2 Modification of Management Plans
A.3 Quality Assurance/Quality Control Coordination
A.4 Review And Approval of Submittals Required by Project Plans and Specifications
A.5 Construction Schedule Updates And Revisions
A.6 Preparation, Submittal and Review of Sow Deliverables
A.7 ERC Monitoring and Enforcement Procedures
A.8 Applications for Exception and Redevelopment Review Procedure
A.9 Design Review Procedures
A.10 Procedures for Documentation of Field Changes to the Design
A.11 Procedures for Proposing, Approval and Initiating And Implementing Project Proposal/Technical Memoranda
A.12 Preparation (and Formats) for Routine Progress Reports to the EPA
A.13 Procedures for Modifying or Adding to the Project Procedures Manual

APPENDIX A.1
CONTINGENCY DESIGN PROCEDURES

1. Suggested changes in the design due to contingencies encountered during or after construction will be discussed by the Design Engineer, WDIG Coordinator and CQA Officer. EPA will be notified of the potential change and can review the proposed contingency design change at EPA's discretion prior to approval and implementation.

2. To implement the design change a sketch will be made of the proposed change and the Design Engineer will formalize the design. As approved by EPA, the new design will be inserted as part of the Design Drawings package and the change can be performed in the field.

3. Additional requirements for design changes and contingency designs are presented in the CQA Plan.

APPENDIX A.2
MODIFICATION OF MANAGEMENT PLANS

1. After initial approval of the Management Plans, new procedures or modifications to any of the Management Plans will be submitted to EPA for approval. The WDIG project coordinator will coordinate proposed changes to the management plans. EPA will review and comment on the changes pursuant to Section 4.0 of the SOW and Section XII of the CD. Comments will be addressed and the new procedure or modification will be resubmitted to EPA for approval prior to implementation.

2. The EPA approved changes or new procedures will be added to the manual in the following manner:
   - Changes to existing Management Plans
     - Modified Management Plan procedures will be inserted into the front of the Management Plan and a note will be put in the section being modified referring to modified procedure.
   - Copies of the changes will be distributed to EPA, WDIG Coordinator and the CQA officer.

3. Changes to the management plans should be performed according to the requirements and additional procedures (primarily related to Quality Control) that are presented in the QAPP.

APPENDIX A.3
QUALITY ASSURANCE/QUALITY CONTROL COORDINATION

1. Overall project quality assurance is coordinated by the WDIG Project Coordinator. In performing this coordination, the WDIG Project Coordinator will designate individuals or companies for overseeing quality assurance and quality control for the various elements of the remedial work being performed. In particular, this includes a Construction Quality Assurance Officer and Contractor, a Laboratory and Monitoring Quality Assurance Officer, and an Operations, Monitoring and Maintenance Quality Assurance Officer.

2. The CQA Contractor is TRC, and Scott Brown, P.E. is the selected CQA Officer. The CQA Officer or his designee will coordinate the collection of data to verify that the construction has been performed in accordance with the approved Design Plans and Specifications as described in the CQA Plan. The data collected by the CQA staff includes but is not limited to: compaction data, material quantities, survey data, materials testing results, as-received geosynthetic material specifications, geosynthetic installation information, and proper placement of Site features. The CQA Officer or his designee will prepare a daily report documenting QA/QC information gathered and any descrepancies with the design criteria. This information will be summarized by the CQA Officer for submittal to the WDIG Project Coordinator and for the Progress Reports to the EPA. The WDIG Project Coordinator will coordinate communication with the EPA and other stakeholders.

3. The Laboratory and Monitoring QA officer is Tom Patterson, Ph.D. of TRC. The laboratory and monitoring QA consists of verifying that data collection activities related to chemical measurements are performed in accordance with the approved QAPP. This includes assuring training of field and laboratory staff in the procedures and goals of the QAPP, auditing field and laboratory procedures, collection and review of field and laboratory data, assuring that all field and laboratory measurements and procedures are appropriately documented, and coordinating data validation.

4. The O&M QA Officer will be selected by the WDI Project Coordinator. The duties of the O&M QA Officer encompass the duties of both the Laboratory and Monitoring QA Officer and the CQA Officer described above, depending on the nature of the work. It is expected that the primary activities will be related to laboratory and monitoring data QA/QC, but if there is some repair construction or on-site redevelopment, construction QA/QC will also be necessary.

APPENDIX A.4
REVIEW AND APPROVAL OF SUBMITTALS REQUIRED BY PROJECT PLANS AND SPECIFICATIONS

1. In accordance with the CD and SOW, documents will be prepared and submitted to EPA for review according to the schedule given in Section 6.2 of the SOW. After review of any plan, report or other item which is required to be submitted for approval pursuant to this CD, EPA shall: (a) approve, in whole or in part, the submission; (b) approve the submission upon specified conditions; (c) modify the submission to cure the deficiencies; (d) disapprove, in whole or in part, the submission, directing that the Settling Defendants modify the submission; or (e) any combination of the above. Review and approval will be coordinated through the WDIG Project Coordinator and EPA remedial project manager.

2. Depending on the EPAs decision, procedures for resubmission are stipulated in Section XII of the CD and Section 4.0 of the SOW. All submittals except for routine progress reports will be treated with the same procedure.

APPENDIX A.5
CONSTRUCTION SCHEDULE UPDATES AND REVISIONS

1. The Construction Schedule will be updated on a periodic basis to account for unexpected delays. The WDIG Coordinator will provide updated project schedules to EPA. Copies of the schedules will be distributed to the Supervising Contractor and CQA Contractor.

2. Revisions to the schedule may be done if the Supervising Contractor changes the order of the construction sequence. Changes that would delay the completion of the remedial work outside the timeframe stipulated in the SOW will need to be approved by EPA before being implemented. New project schedules will be distributed to the WDIG Coordinator and the CQA Contractor.

3. The schedule shall be updated monthly to reflect substantive changes in activity start and completions activity sequencing, planned or unexpected. The updated monthly schedules will be included in the Monthly Progress report. The substantive schedule changes must be approved by EPA.

APPENDIX A.6
PREPARATION, SUBMITTAL AND REVIEW OF SOW DELIVERABLES

1. In accordance with the CD and SOW, documents will be prepared and submitted to EPA for review according to the schedule given in Section 6.2 of the SOW. After review of any plan, report or other item which is required to be submitted for approval pursuant to this CD, EPA shall: (a) approve, in whole or in part, the submission; (b) approve the submission upon specified conditions; (c) modify the submission to cure the deficiencies; (d) disapprove, in whole or in part, the submission, directing that the Settling Defendants modify the submission; or (e) any combination of the above.

2. Depending on the EPAs decision, procedures for resubmission are stipulated in Section XII of the CD and Section 4.0 of the SOW. All submittals except for routine progress reports will be treated with the same procedure. Additional documents control requirements are presented in the QAPP and SAP.

APPENDIX A.7
ERC MONITORING AND ENFORCEMENT PROCEDURES

1. In accordance with Sections IX and X of the CD, the WDIG will monitor and enforce Environmental Restriction Covenants recorded on properties at the Site. The WDIG has prepared and EPA approved an Institutional Controls, Monitoring and Enforcement Work Plan in accordance with Section 5.13 of the SOW. Settling Defendants shall commence monitoring under this plan when one or more Environmental Restriction Covenants have been recorded on property at the Site pursuant to the Amended ROD.

2. Monitoring of the Environmental Restriction Covenants shall consist of quarterly, or at a frequency otherwise directed by EPA, inspections of the properties at the Site on which Environmental Restriction Covenants have been recorded. Settling Defendants shall note any violations of the Environmental

3. Restriction Covenants and shall report any violations to EPA within ten (10) days of the inspection. Settling Defendants shall review the title documents in the County Recorder's Office for Los Angeles County semiannually, or as directed by EPA, to determine whether or not Environmental Restriction Covenants remain in place on the properties at the Site. Settling Defendants shall notify EPA within five (5) days of such inspection of the removal or modification of any of the Environmental Restriction Covenants at the Site.

4. Settling Defendants shall ensure that the WDIG Site Trust enforces any violations of the use restrictions and access provisions of the Environmental Restriction Covenants on properties at the Site, through its position as covenantee of the Environmental Restriction Covenants. However, the WDIG Site Trust shall not be required to enforce the Environmental Restriction Covenants for any property on which a new building or other permanent structure has been constructed after the date of lodging of the CD, or on properties on which buildings are substantially modified and in a manner that requires a City of Santa Fe Springs building or other land use permit.

APPENDIX A.8
APPLICATIONS FOR EXCEPTION AND REDEVELOPMENT REVIEW PROCEDURE

1. The Amended ROD, the CD and SOW have established institutional controls that include land/water use restrictions to prohibit and restrict certain activities unless expressly approved by EPA. Section IX, Paragraph 25.c of the CD describes the process through which EPA may grant approvals for Exceptions to the land/water use restrictions on any property at the Site owned by any member of the WDIG. Additionally, redevelopment of the Site must be coordinated with the WDIG and the EPA to ensure that remedial design objectives are not compromised and the requirements of the WDIG's Institutional Controls Monitoring and Enforcement Work Plan must be followed. The IAC will be the forum for review of Applications for Exceptions and redevelopment proposals.

2. EPA will seek to expedite their review of Applications for Exceptions and redevelopment projects, subject to the scope of the proposed activity. Through the IAC process, EPA will coordinate requirements, schedules, technical reviews, and comments with other public entities, including the City of Santa Fe Springs, to facilitate the timely and effective review of proposed redevelopment projects and Applications for Exception to the land/water use restrictions.

3. EPA may grant Exceptions to the land/water use restrictions based on Applications for Exceptions and supporting documentation that must be submitted by entities seeking to obtain an Exception to the land/water use restrictions. EPA will identify specific data requirements necessary to complete a review of each Application or redevelopment proposal on a case-by-case basis depending on the nature of the proposed activity. Such informational requirements may include, but not be limited to, work plans, design reports, drawings, construction plans and specifications, monitoring plans, health and safety plans, quality assurance plans, operation and maintenance plans, and land use plans. The level of detail required for documentation to support an Application for Exception or redevelopment project may vary, depending on the nature and scope of the proposed activity.

4. At EPA's request, the WDIG will review copies of Applications for Exceptions to the land/water use restrictions and redevelopment proposals and provide review comments to EPA according to a schedule to be determined by EPA. In their reviews, the WDIG will

evaluate the proposed activities and identify potential systems, tasks, or activities that may impact the Site remedy and would therefore require mitigation by those entities seeking to undertake activities.

5. Based on review of an Application for Exceptions or redevelopment proposal, EPA may approve, require additional information, approve with conditions or modifications, or deny the Application for Exception to the land/water use restrictions. If EPA makes the determination to deny an Application for Exception, EPA shall provide written notification documenting the basis for that determination. If EPA approves the Application for Exceptions or redevelopment proposal, the applicant shall implement and comply with the required provisions as approved.

APPENDIX A.9
DESIGN REVIEW PROCEDURES

1. Suggested changes in the design due to requests by the contractors or others during construction will be discussed by the Design Engineer, WDIG Coordinator and CQA Officer. EPA will be notified of the potential change and can review the proposed design change for final approval at EPAs discretion.

2. To implement the design change a sketch will be made of the proposed change and the Design Engineer will formalize the design. If there are no comments from EPA the new design will be inserted as part of the Design Drawings package and the change can be performed in the field. Additional requirements for design changes are presented in the CQA Plan.

APPENDIX A.10
PROCEDURES FOR DOCUMENTATION OF FIELD CHANGES TO THE DESIGN

1. Field changes to the Remediation Design are those changes that do not require formal approval of EPA to be implemented. Field design changes will be presented to the WDIG Coordinator, Design Engineer and CQA Officer for approval. The design changes will be recorded in the daily reports. The site copy and the CQA copy of the Design Drawings will be marked in red with the change and description, if necessary. Field changes to the design will be described in the Monthly Progress Reports to EPA. Additional requirements for documentation of field changes to the design are presented in the CQA Plan.

APPENDIX A.11
PROCEDURES FOR PROPOSING, APPROVAL AND INITIATING AND IMPLEMENTING PROJECT PROPOSAL/TECHNICAL MEMORANDA

1. If required, either WDIG or EPA may propose a modification to an existing environmental control system or monitoring or operating procedures to improve current levels of performance and functional capability of Site facilities and environmental control systems. When such an improvement is proposed by either EPA or the WDIG, WDIG shall prepare a Project Proposal/Technical Memorandum and submit it to EPA for review and approval.

2. WDIG shall include at least the following elements in each Project Proposal/Technical Memorandum:
   - Summary of proposed improvements or activities;
   - Reason for proposed improvement or activity;
   - Evaluation of other alternatives;
   - Operational effects;
   - Coordination and integration activities;
   - Qualitative summary of short- and long-term cost effects;
   - Health and safety effects;
   - List of deliverables, including reports, reports of findings, other technical memoranda, predesign and designs, amendment of management plans, and completion report;
   - Progress submittals and reviews;
   - Alternatives for implementation;
   - Procedures for the salvaging or abandonment of existing equipment, facilities, and Site systems;
   - Schedule for implementation (including submittals, allowances for EPA reviews, review conferences, and facility tours and inspections);
   - Design and implementation precautions;
   - Quality assurance/control procedures; and
   - Sampling and analysis plans.

3. EPA will review submittal and make comments or approve the action described. Comments will be addressed by WDIG and the package resubmitted to EPA for final approval. After EPA approval the work or change described in the approved submittal will be incorporated into the remedial design where appropriate.

APPENDIX A.12
PREPARATION (AND FORMATS) FOR ROUTINE PROGRESS REPORTS TO THE EPA

1. Routine progress reports will be made to the EPA as prescribed in Section 5.15 of the SOW. Reports will be sent to EPA by the 10th of every month and will describe progress, issues, challenges, and expenditures related to the Work. Comments received from EPA will be addressed in the Routine Progress Reports. The reports will be formatted with the following elements included:
   - Narrative description of work completed during the reporting period;
   - Discussion of changes and/or modifications;
   - Discussion of any detected non-compliance;
   - Discussion of any delays in the project implementation schedule;
   - Discussion of significant issues or challenges;
   - Percentage of Work completed by task; and
   - Summary of costs & expenditures incurred during the reporting period.

2. Until the RA Completion Report is approved, WDIG will submit monthly progress reports to EPA in accordance with the requirements presented in Section XI, Paragraph 41 of the Consent Decree. Following EPA approval of the RA Completion Report and until the Work Completion Report is approved, WDIG will submit progress reports quarterly. WDIG may combine any reports due concurrently under the Consent Decree or the Amended UAO and submit those reports together.

APPENDIX A.13
PROCEDURES FOR MODIFYING OR ADDING TO THE PROJECT PROCEDURES MANUAL

1. After initial approval of the Project Procedures Manual, new procedures or modifications to the Project Procedures Manual will be submitted to EPA for approval. EPA will review and comment on the changes to the Project Procedures Manual. Comments will be addressed and the new procedure or modification will be resubmitted to EPA for review.

2. The EPA approved changes or new procedures will be added to the manual in the following manner:
   - Changes to existing Project Procedures
     - Old procedure will be removed from the manual.
     - Modified procedure will be inserted as Rev # of the procedure (i.e., procedure A.5 will be replaced by procedure A.5 Rev. 1).
     - Future revisions will be marked Rev. 2, Rev. 3 etc.
   - New procedures will be inserted at the end of the Manual and given the next sequential designation.
   - Copies of the changes will be distributed to EPA, WDIG Coordinator and the CQA officer.

APPENDIX B

SITE MANAGEMENT PLANS

B.1 Project Transition Plan
B.2 Site Coordination Plan
B.3 Mitigation Plan
B.4 Site Access and Security Plan
B.5 Waste Materials Disposal Plan
B.6 Stormwater Pollution Prevention Plan

APPENDIX B.1
PROJECT TRANSITION PLAN

1.0 INTRODUCTION

1. With the completion of the remedial design for the WDI Site, the guiding document for the remediation work to be performed transitions from the AAO No. 97-09 to the CD. In general, the AAO work included investigation and design, and the CD work is remedial construction and operations and maintenance. This transition requires special mention, according to the SOW of the CD, so that work items and agreements such as monitoring, site control, and site access agreements are appropriately carried forward.

2. This document represents the transition plan, required under the SOW for the CD, to assure that the ongoing elements of the remediation program are continued. The four key elements of work that must be addressed are:
   - Site monitoring,
   - Site control,
   - Security and access agreements,
   - Database Management and document control.

   Each of these are discussed in turn in the sections below.

2.0 SITE MONITORING

1. Site monitoring has been performed according to an approved monitoring program for the past several years. The monitoring program is implemented through procedures presented in the approved SAP and QAPP. Each of these plans has been amended over time as the scope and objectives of the monitoring has progressed.

2. Site monitoring includes ground water, stormwater, soil gas and in-business air monitoring. Sampling of each of these media occurs periodically, on various quarterly, semi-annual and annual schedules.

3. Site monitoring has been performed for the past several years by TRC, the Contractor selected by the WDIG for site operations, monitoring and maintenance. During the construction period, site monitoring will continue to be performed by TRC under the direction of the

WDIG Project Coordinator. TRC will continue to work with the project analytical laboratories to assure control of quality as described in the QAPP. TRC will also support the WDIG Project Coordinator in modifying and updating the monitoring program as necessary during the construction phase. Following the construction phase, and Operations, Monitoring and Maintenance Subcontractor will be selected by the WDIG to perform Long-Term Monitoring of Ground Water, Soil Gas, and In-Business Air. The Long-Term Monitoring Contractor will perform the same functions and duties as described above for TRC during the construction phase.

4. The approved Remedial Design Report (TRC, May 2003) presents an updated framework for monitoring of the media of concern. The updated framework has taken the existing program and modified it as appropriate for construction and performance monitoring, rather than for investigation monitoring. The in-business monitoring also serves the function of assuring health protective conditions, and future modifications to the in-business monitoring program will be based on observations and conditions in the existing database.

5. To transition the work to construction and performance monitoring, three documents required by the SOW have been or will be prepared. These are the OMMP (including the Operations and Maintenance Plan, Long-Term Soil Gas and In-Business Ambient Air Monitoring Plan, and Long-term Groundwater Monitoring Plan), the SAP, and the QAPP. The OMMP details the monitoring and reporting plans, and the SAP and QAPP detail the procedures, quality control programs, quality assurance documentation, and record keeping requirements. The OMMP will be prepared according to the requirements of the SOW by TRC under the direction of the WDIG Project Coordinator.

6. The SAP and QAPP updates have been prepared by TRC and submitted for approval. The updates are based on the most current versions of the SAP and QAPP from the AAO work and recent guidance from EPA Quality Assurance Management Section. The updates reflect a revised monitoring schedule proposed for the construction and post-construction period. The OMMP will be prepared by TRC according to the framework provided in the Remedial Design Report.

3.0 SITE CONTROL

1. Site control includes Site security during and after construction, inspection and maintenance of Site facilities and conditions not related to remediation (i.e., weed control), health and safety, and coordination with property owners and tenants. In the past, this has been performed by TRC under the supervision of the WDIG project coordinator (i.e., Project Navigator, Ltd.).

2. To maintain Site control during construction, the supervising contractor is required to prepare and implement a health and safety plan and Site security plan. These plans have been prepared by Recon and TRC under the guidance of the WDIG project coordinator, who is eminently familiar with Site conditions, security issues, health and safety issues, and the needs and personalities of the property owners and tenants. The site security plan is included in this RAWP as Appendix B.4. The health and safety plan has been submitted to EPA under separate cover.

3. Site control plans for the post construction phase will be included in the OMMP-. Site control will be performed by the selected supervising contractor (i.e., Recon and TRC) for at least one year, and then by the operations and maintenance contractor selected by the WDIG thereafter. The implementation will be performed under the oversight of the WDIG project coordinator and the EPA. The OMMP is being prepared as described in Section 2.0 above.

4.0 ACCESS AGREEMENTS

1. Access agreements are in place between the EPA and the property owners of the Site. The existing access agreements were developed to assure that all response actions at the Site could be performed. The existing access agreements apply to the construction and operations, monitoring and maintenance work required under the CD and SOW. The WDIG coordinates compliance with the access agreements through all phases of the work.

5.0 DATABASE MANAGEMENT AND DOCUMENT CONTROL

1. Database management during the construction phase will continue to be the responsibility of the WDIG Project Coordinator. Results of sampling and analysis are required to be forwarded to the WDIG Project Coordinator, and the WDIG Project Coordinator must be notified of all sampling and analytical activities. The WDIG Project Coordinator is also responsible for maintaining a project file in accordance with the requirements of the QAPP. As the Project Coordinator for WDIG has not changed as part of transition, it is not anticipated that there will be any issues arising from transition related to database management and document control.

2. Similarly during the operations and maintenance phase the WDIG Project Coordinator is expected to maintain responsibility for maintaining the database and project file. However, the WDIG Project Coordinator may delegate this responsibility to a selected contractor. EPA would be notified if such a chance is going to be proposed.

6.0 OTHER CONSIDERATIONS

1. The CD requires the following additional elements for this transition plan; they addressed as noted below:
   - **Procedures to coordinate and integrate the transition with other Site activities.** These procedures are described above.
   - **Procedures and schedule for verification that existing facilities proposed for transitioning to the Settling Defendants meet Performance Standards.** There are no specific performance standards for existing facilities other than the design of monitoring systems. The existing monitoring wells and vapor probes are consistent with the approved design. The schedule for verification for the existing facilities is at the completion of construction, as part of compliance testing and preparation of the completion of construction report. The verification would be included with the As-Built/Construction Completion documentation prepared by TRC and Recon under the direction of the WDIG Project Coordinator.
   - **Personnel and facilities mobilization logistics and schedule.** As the activities requiring transition are largely being performed by the same groups and individuals during the construction phase as were performing these activities during the AAO work, the personnel are the same and no modification is necessary. Therefore, no schedule for such activities is necessary. During transition to the operations and maintenance phase, if a different construction group is selected, a plan for transition of work and

site control would be prepared. The WDIG Project Coordinator will act as the point of continuity for transitioning, and the current Site Management Contractor (TRC) will be available for information and to answer any questions.

- **Procedures to be used to amend or otherwise modify approved management plans for incorporation of changes in required activities as may be proposed by the Settling Defendants or required by EPA.** These procedures are included in the QAPP and project procedures manual (Appendix A of the RAWP). Additional procedures are included in the CQA Plan.
- **Training of the Settling Defendants' Supervising Contractor, if applicable.** The WDIG Project Coordinator will provide the guidance and information to selected contractor that is necessary to assure carrying forward the work activities described in sections 2 through 4 above and will verify that the groups or individuals selected to perform certain tasks have the training or qualifications to perform the work.
- **The process and schedule for transition or transfer of existing and/or new acquisition of all insurance, operating, waste discharge and other permits, and permits and licenses required for conducting the Work specified by the CD, including special maintenance activities required in easements and right-of-ways under the control of other parties.** The WDIG, in consultation with the Supervising Contractor, would be responsible for acquisition of necessary insurance, easements and any waste discharge or other permits. There are no existing permits or licenses to perform the work under the AAO.

APPENDIX B.2
SITE COORDINATION PLAN

PURPOSE

1. This Coordination Plan (Plan) describes the procedures for coordination with public and private entities involved in ongoing Site activities during the performance of the Work, including any future redevelopment of the Site. Procedures for interaction with regulatory agencies can be found in the Remedial Action Work Plan (RAWP).

POTENTIAL FOR INTERACTION

1. Several entities may interact with the WDIG during their performance of the Work. They include the following:
   Owners/Tenants
   City of Santa Fe Springs
   Potential Redevelopers

2. The following table summarizes where coordination procedures for with these entities can be found:

ENTITY	POTENTIAL INTERACTION	REFERENCE FOR COORDINATION PROCEDURES
Owners/Tenants	Access and logistical cooperation during Remedial Action Construction	Remedial Action Work Plan (RAWP), Appendix B.2 – Mitigation Plan
	Access during Operations & Maintenance	Institutional Controls Monitoring & Enforcement Work Plan
City of Santa Fe Springs	Work progress updates	Community Relations Participation Plan
Potential Redevelopers	Construction over remedy components	This Plan, see below

REDEVELOPMENT INTERACTION

1. Although the WDIG does not have a formal role in the approval of new construction at the Site, EPA may call upon the WDIG to assist in the review of new Site redevelopments. Table B.2.1 describes the various entities that a redeveloper would have to interact with during new construction approval process.

2. A redeveloper would become aware of the approval process via the restrictions imposed by the Environmental Restrictive Covenants placed upon all Site parcels. The redeveloper would have to begin interactions with the City of Santa Fe Springs. Construction plans would be submitted to EPA for approval; EPA primary criterion being the assurance of protection of the integrity of the remedy. At EPA's discretion, the WDIG could assist in the review of the construction plans.

APPENDIX B.3
MITIGATION PLAN

B.3.1 PURPOSE

1. The SOW requires a plan describing the procedures that will be followed for minimizing and mitigating the impacts to existing permanent structures, buildings and their occupants during implementation of the Work. The following elements are required in the plan:
   - Detailed descriptions of the impacts of the Work on specific buildings and business activities, and operations, including discussions of any disruptions, whether temporary or permanent, to ongoing activities conducted at the Sites of buildings or permanent structures.
   - Descriptions of actions or activities proposed to mitigate temporary or permanent disruptions to ongoing business activities for buildings.
   - Descriptions of actions or activities proposed to mitigate temporary or permanent disruptions to ongoing business activities or permanent structures, such as the existing storage facility for recreational vehicles.
   - Discussion of notification procedures, coordination, scheduling, and logistics related to the implementation of mitigation for disruptions to existing permanent structures, buildings and business activities.
   - Procedures for coordination with EPA Community Relations Program for the Site.
   - Schedules of Work activities that impact the building occupants.
   - Business Site Security provisions during Settling Defendants' remedial activities.
   - Instructions for temporary parking, if required.
   - Procedures for dealing with business occupant complaints and disputes.

2. This plan presents the mitigation procedures required by the SOW.

B.3.2 EXISTING BUSINESS AND SCOPE OF REMEDIAL ACTION CONSTRUCTION

1. There are 17 existing Site parcels with businesses that would be impacted directly to the Remedial Action (RA) construction activities. Table 1.0 lists the existing businesses. The owners and tenants of these businesses have been notified by EPA that Remedial Action construction activities will be performed on their properties.

2. The scope of Remedial Action construction activities include the following:
   - Installation of RCRA Sub-title D equivalent cover.
   - Replacement of existing asphalt with engineered asphalt cover.
   - Placement of 2-inch asphalt overlay cover.
   - Replacement of existing concrete with engineered concrete cover.
   - Concrete floor slab inspections.
   - Concrete floor slab crack sealing.
   - Sealing of existing asphalt.
   - Installation of bio-vent wells.

3. Please refer to Section 2 of the Remedial Action Work Plan for descriptions of these construction activities. Attachment B.3.1 - Parcel Specific Work Plans summarizes the specific activities that will occur at each business. These activities are presented in detail in the Design Plans and Specifications.

B.3.3 POTENTIAL IMPACTS

1. The impacts to the existing businesses will generally be of short duration (e.g., two to five days each, although one business, Brothers Machine, will have a longer duration), but in some instances, multiple potential disruptions may occur (e.g., once for modifications in the buildings and once for paving the yard). The impacts will fall in the following two categories:
   - Restricted access to outside storage or parking areas
   - Restricted access or no access to interior areas

2. Section 4.0 discusses the measures to be employed to minimize the disruption to the businesses.

B.3.4 MITIGATION PROCEDURES

1. The key to minimizing disruptions to the existing businesses on the Site will be effective communication with the Owner/Tenants. Flexible scheduling is also important. The following subsections discuss both the communication procedures and general mitigation strategies.

B.3.4.1 OWNER/TENANT MEETINGS

1. One-on-one meetings with the Owner/Tenantswere held in December 2003, prior to the RA construction field mobilization. The purpose of these meetings was to:
   - Discuss the logistics of each business, so that the RA construction work can be scheduled, to the extent possible, around critical times or operations.
   - Determine a fixed time frame for performing the activities.
   - Discuss the communication procedures before, during and after the RA construction activities.
   - Discuss temporary access and employee parking procedures
   - Discuss measure that are necessary for preparation of performing the work (i.e., moving equipment, furniture, or stock; keeping the parking lot clear, etc.).

2. The meetings were attended by the TRC Project Manager (since TRC will be managing the work at the onsite businesses), the WDIG Project Coordinator, and representatives of the owners and the businesses. Also attending were the EPA Community Participation Coordinator and the Army Corp of Engineers construction oversight engineer.

3. The Parcel Specific Work Plans (see Attachment B.3.1) summarize the results of the meetings, including agreements for timing, access control, notification and scope of remedial activities.

B.3.4.2 MITIGATION STRATEGIES

1. A variety of mitigation strategies have been developed to minimize impacts to the operating businesses and facilitate timely completion of the remediation work. These include:
   - Scheduling the work on off-hours (weekends and/or evenings) to the extent possible.
   - Performing the work as rapidly as possible to minimize the period of potential disruption.
   - Further developing a positive relationship with the onsite personnel (i.e., letting the owners/tenants know that the remedial work will result in improvements to their property, including new pavement for their parking lots, removal of derelict equipment and other debris, and improved drainage).

- Offering to hire workers from the onsite businesses to help prepare the various sites for the work to be performed (i.e., paying existing workers to move furniture, equipment, etc.) to minimize potential payroll impacts to the businesses.

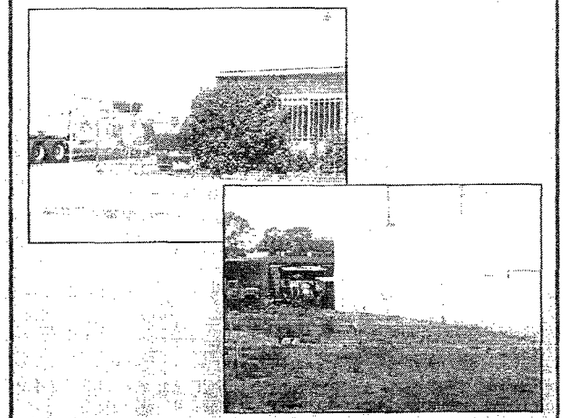
2. If any landowners or tenants are recalcitrant in their obligations for access and cooperation, as provided for in executed access agreements and in the recently lodged landowners Consent Decrees, matters will be referred to the EPA Regional Project Manager and the EPA Regional Counsel for resolution.

TABLE B.3.1

SUMMARY OF EXISTING BUSINESSES

PARCEL NO.	UNIT NO.	TENANT	TENANT CONTACT	TENANT ADDRESS	TENANT PHONE NO.	CURRENT LAND USE
3	1	Metro Diesel Injection	Monty Torres	12631 Los Nietos Rd	562-944-4846	Manufacturing
	2	Ben Vasquez	Ben Vasquez	12633 Los Nietos Rd	562-903-1770	Unknown
	3	Vacant		12635 Los Nietos Rd		
	4	Stansell Brothers	Vern Stansell	12635 Los Nietos Rd	562-946-6676	Machine Shop
4	1	Air Liquide	Bruce Beaton	9756 Santa Fe Springs Rd	562-906-8710	Industrial Gas Distribution
7	1	A & L Sweep Systems	Kim Goines	9610 Santa Fe Springs Rd	562-693-2971	Street Sweeping
	2					
	3	Unknown				
	1	ARPI	Jim West	9618 Santa Fe Springs Rd #1	562-946-5907	Machine Manufacturing
	2					
	3	Spyke, Inc.	Willie Lanham	9618 Santa Fe Springs Rd #3	562-693-2983	Unknown
	4	ARPI	Jim West	9618 Santa Fe Springs Rd #1	562-946-5907	Machine Manufacturing
	5	Vacant				
	6	Nowever	Nowever	9618 Santa Fe Springs Rd #7		
	7					
	8					
	9	OMR Industrial Machining	Jesus/Marcos Orizaba	9618 Santa Fe Springs Rd #9	562-777-9119	Industrial Manufacturing
	10	Unknown				
	11	ARPI	Jim West	9618 Santa Fe Springs Rd #11	562-946-5907	Machine Manufacturing
	12					
	13	Kinghill Electric Contractors		9618 Santa Fe Springs Rd #13		Contractors
	14	R & M Maintenance	Marty Marcum	9618 Santa Fe Springs Rd #14	562-906-0001	
	15	D. A. Lovell Cabinets		9618 Santa Fe Springs Rd #15		Furniture Manufacturing
	16	Talon Manufacturing		9618 Santa Fe Springs Rd #16		
11	1	AAG Metals	Albert Leung		562-698-9762	Manufacturing
12	1			12645 Los Nietos Road		
	2			12647 Los Nietos Road		
	3			12649 Los Nietos Road		
21	1	Chillers Services	Bruce Kolstad	9620 Santa Fe Springs Rd	562-906-0105	Air Conditioning/Demolition
22	1	Gold Coast Refractory	Robert Black	9630 Santa Fe Springs Rd	562-946-1942	Metal Work
24	1	Buffalo Bullet	Ronald Dahlitz	12637A Los Nietos Rd	562-944-0322	Bullet Manufacturing
	2	C & E Metal Products, Inc.	Mark Ellis	12637B Los Nieto Rd	562-946-6661	Machine Shop
28	1	Mersits Equipment	Tom Mersits	9640 Santa Fe Springs Rd	562-946-5707	Heavy Equipment Rentals
29	1				562-946-5806	
32	1	California Reamers	Dave/Lori Neptune	12747 Los Nietos Rd	562-946-6377	Machine Shop
37	1	Euro Fabrics	Rudy Chavez	12803 Los Nietos Rd	562-777-0994	Sporting Good Wholesaler
	2	Unknown				
41	1	Four C's Transmission	Julian Nieto	12807A Los Nietos Rd	562-946-9272	Automotive Shop
	2	Seal Methods, Inc.	Eugene Welter	12807B Los Nietos Rd	562-944-0291	Gadgets and Manufacturing
	3	2 Stage Enterprises	David Campion	12809A Los Nietos Rd	562-841-5149	
	4	Bert's Automotive	Bert Lowell	12809B Los Nietos Rd	562-941-4502	Automotive Shop
	5	Seal Methods, Inc.	Eugene Welter	12811A Los Nietos Rd	562-944-0291	Gadgets and Manufacturing
	6	Unknown		12811B Los Nietos Rd		
	7	Leo's Lawnmower	Leo Rojas	12811C Los Nietos Rd	562-944-0538	Machine Shop
	8	Hernandez Auto	Octavio Hernandez	12811D Los Nietos Rd	562-777-1197	Automotive Shop
	9	H & H Contractors	Roger Hall	12811E Los Nietos Rd	562-946-5108	Contractors
	10			12811F Los Nietos Rd		
42	1	Airbrake Associates	Daniel Wedge	12741 Los Nietos Rd	562-946-4960	Automotive Manufacturing
42b	2	Mikes Speed & Machine	Mike Pighera	12741 Los Nietos Rd	562-522-2878	Machine Shop
43	1	Timmon's Wood Products	Ed Timmons	12723 Los Nietos Rd	562-946-5401	Wood Product Manufacturing
44	1	Sisneros Office Furniture	Dave Hoffman	12717 Los Nietos Rd	562-777-9797	Furniture Manufacturing
50	1	Brothers Machine & Tool	Jose Razo	9843 S. Greenleaf Ave.	562-903-1117	Machine Shop

PARCEL NO. 3, Krown Kustoms and Metro Diesel Injection SPECIFIC WORKPLAN



NOTE: -Parcel NO.3 is located on the left of the photo
-Photographs are current

Parcel Information

Parcel No. APN 8167-002-003
Owner: Raymond & Donnis Holbrook Trust.
Tenants: Krown Kustoms/
Metro Diesel Injection
Area: 0.80 Ac. (Total for Parcel #3)

Construction Activities

1. Install Bio-Vent wells BW-17 and BW-18, as shown

Key WDIG Agreements

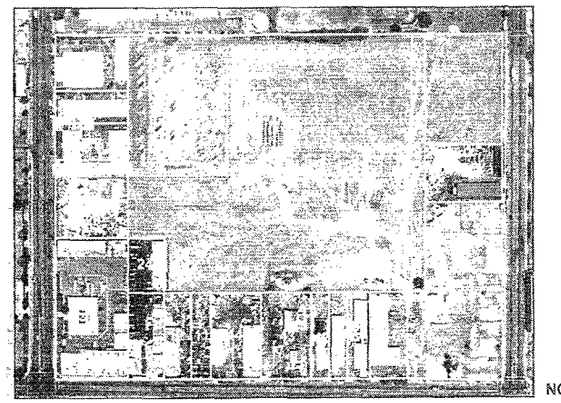
- Two week notice to tenants at start of work

Key Tenant/Owner Agreements

- Tenants agree to allow remedial contractor traffic to Stansell Brothers and Parcel #24.

Final Version: 2-24-04

	Task Name	Duration	Start	Finish	March	April
155	Parcel #3	10 days	Mon 4/5/04	Fri 4/16/04		
166	Site preparation	5 days	Mon 4/5/04	Fri 4/9/04		
167	Remove and replace concrete	5 days	Mon 4/12/04	Fri 4/16/04		
168	Seal interior floor slabs	3 days	Mon 4/12/04	Wed 4/14/04		



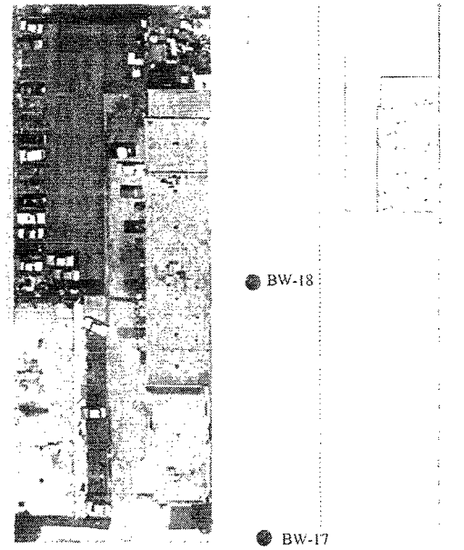
NOTE: Photograph from 1998.

Health and Safety

- Tenant agrees to keep personnel and equipment out of remedial construction area during performance of the work on Parcel #3, specifically at Stansell Brothers, and Parcel #24

Access and Security

- Access:
  - Allow remedial contractors access to work area during scheduled work day
  - Some traffic in and around remedial construction activity
  - Parking may be restricted
- Security:
  - Coordinate security procedures with tenant/owner prior to beginning work



NOTE: Photograph from 1998.

Legend

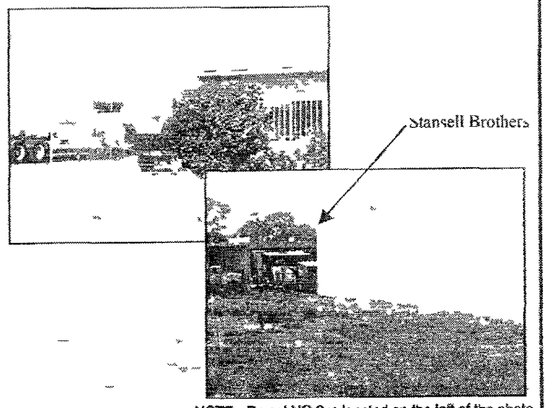
- RCRA SUBTITLE C-EQUIVALENT CAP AREA — DETAIL 4 (9 | 10)
- RCRA SUBTITLE D-EQUIVALENT COVER AREA — DETAIL 5 (9 | 10)
- REMOVE EXISTING ASPHALT AND REPLACE WITH ENGINEERED ASPHALT COVER — DETAIL 6 (9 | 10)
- 2" ASPHALT OVERLAY COVER — DETAIL 6A (9 | 10)
- REMOVE EXISTING CONCRETE AND REPLACE WITH ENGINEERED CONCRETE COVER — DETAIL 7 (9 | 10)
- ENGINEERED CONCRETE COVER WITH SEALED CRACKS — DETAIL 7A (9 | 10)
- SEAL ASPHALT AND RESTRIPE

Contact Information

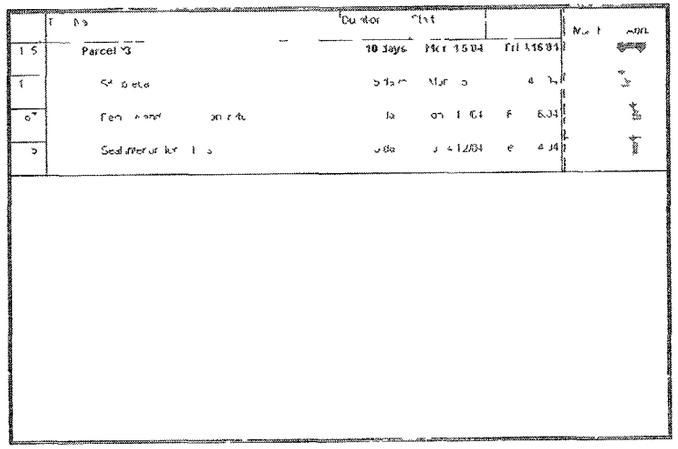
3. Krown Kustoms: Ben Vasquez, 562.903.1770

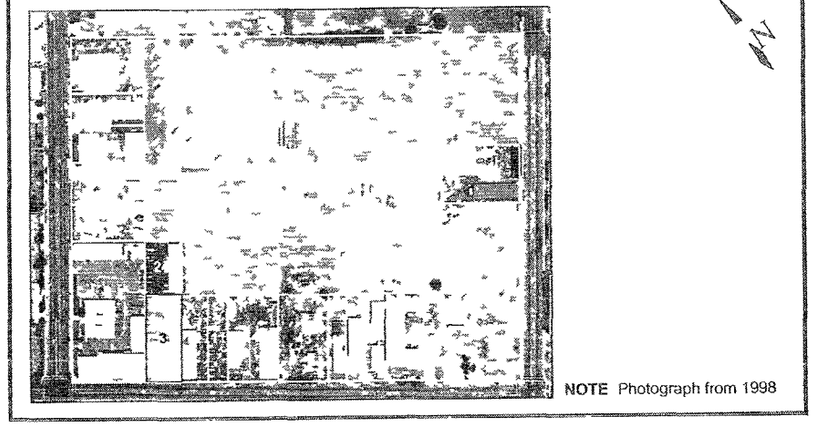
PROJECT NAVIGATOR, LTD.

PARCEL NO. 3, Stansell Brothers - Unit #4 SPECIFIC WORKPLAN



NOTE -Parcel NO 3 is located on the left of the photo
Photographs are current





NOTE Photograph from 1998

Parcel Information

Parcel No APN 8167 002-003
Owner: Raymond & Dennis Holbrook Trust
Tenants. Stansell Brothers
Area 0 80 Ac. (Total for Parcel #3)

Construction Activities

1 Seal and replace concrete outside of building
2 Seal cracks with epoxy in the Northern most room and in main workroom
3 Install 1 new Bio-Vent well, BW-16 as shown

Key WDIG Agreements

1 Two week notice at start of work

Key Tenant/Owner Agreements

1 Tenants agree to allow access to remedial contractors to interior of the business for crack sealing
2 Allow access for outside concrete sealing and replacement

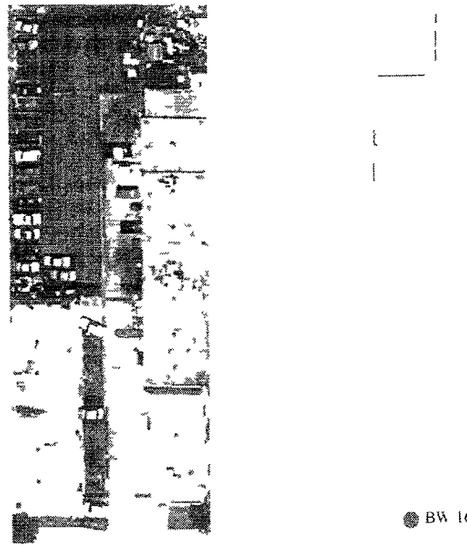
Final Version 2 24-04

Health and Safety

- Tenant agrees to keep personnel and equipment out of remedial construction area during performance of the work specifically at Stansell Brothers and Parcel #24
- Attached is a fact sheet containing information on the epoxy compound that will be used to seal and insulate the building foundation

Access and Security

- Access
  - Allow remedial contractors access to work area during scheduled work day
  - Some traffic in and around remedial construction activity
  - Parking may be restricted
- Security
  - Coordinate security procedures with tenant/owner prior to beginning work



NOTE Photograph from 1998

Legend

RCRA SUBTITLE C EQUIVALENT CAP AREA
1 DETAIL 4 (9 | 10)

RCRA SUBTITLE D EQUIVALENT COVER AREA
DETAIL 5 (9 | 10)

REMOVE EXISTING ASPHALT AND REPLACE WITH ENGINEERED ASPHALT COVER
DETAIL 6 (9 | 10)

2 ASPHALT OVERLAY COVER
DETAIL 6A (9 | 10)

REMOVE EXISTING CONCRETE AND REPLACE WITH ENGINEERED CONCRETE COVER
DETAIL 7 (9 | 13)

ENGINEERED CONCRETE COVER WITH SEALED CRACKS
DETAIL 7A (9 | 10)

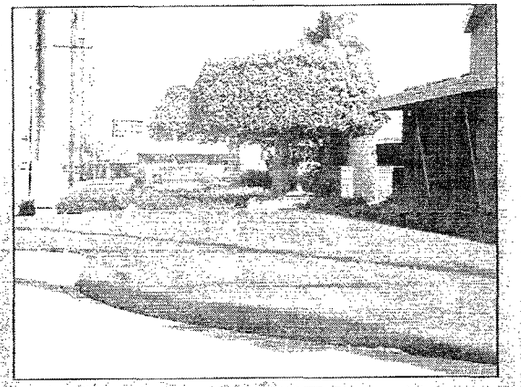
SEAL ASPHALT AND RESTRIPE

Contact Information

2 WDIC Project Manager Roberto Puga 714 449 8922 3 Stansell Brothers Vern Stansell 562 946 6676

PROJECT NAVIGATOR LTD

PARCEL NO. 4 SPECIFIC WORKPLAN



NOTE: Photograph is current.

Parcel Information

Parcel No. APN 8167-002-004
Owner: Dia-Log Company
Tenants: Air Liquide
Area: 2.62 Ac.

Construction Activities

1. Install 2 new Bio-Vent wells, as shown

Key WDIG Agreements

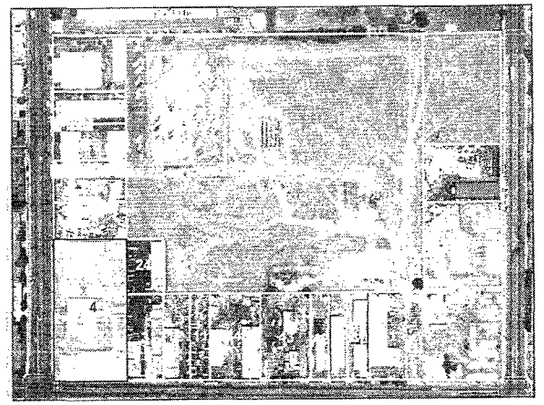
1. Two week notice at start of work

Key Tenant/Owner Agreements

1. Access for installation of Bio-Vent wells Nos. 21 and 22

Final Version: 2-24-04

No work on property.



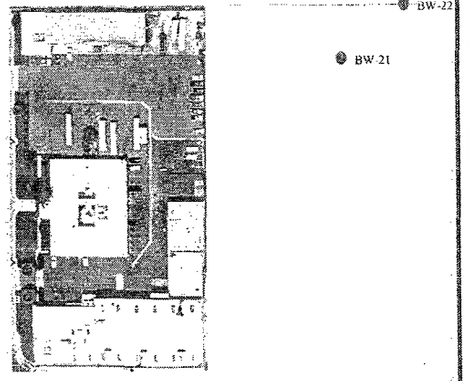
NOTE: Photograph from 1998.

Health and Safety

- Tenant agrees to keep personnel and equipment out of remedial construction area during performance of the work.

Access and Security

- Access:
  - Allow remedial contractors access to work area during scheduled work day
- Security:
  - Coordinate security procedures with tenant/owner prior to beginning work



NOTE: Photograph from 1998.

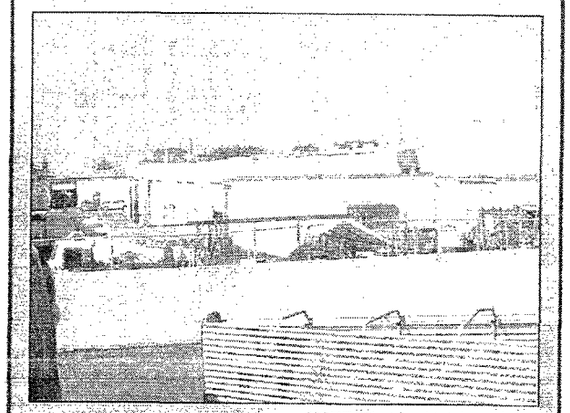
Legend

- RCRA SUBTITLE C-EQUIVALENT CAP AREA — DETAIL 4 (9|10)
- RCRA SUBTITLE D-EQUIVALENT COVER AREA — DETAIL 5 (9|10)
- REMOVE EXISTING ASPHALT AND REPLACE WITH ENGINEERED ASPHALT COVER — DETAIL 6 (9|10)
- 2" ASPHALT OVERLAY COVER — DETAIL 6A (9|10)
- REMOVE EXISTING CONCRETE AND REPLACE WITH ENGINEERED CONCRETE COVER — DETAIL 7 (9|10)
- ENGINEERED CONCRETE COVER WITH SEALED CRACKS — DETAIL 7A (9|10)
- SEAL ASPHALT AND RESTRIPE

Contact Information

3. Air Liquide: Bruce Beaton, 562 906 8710

PARCEL NO. 7 SPECIFIC WORKPLAN



NOTE: Photograph is current.

Parcel Information

Parcel No. APN 8167-002-007

Owner: Eugene and Geraldine Welter Trust

Tenants: A&L Sweep Systems; OMR Industrial Machining; ARPI; Kinghill Electric Contractors; Spyke, Inc.; R&M Maintenance; D.A. Lovell Cabinets; Talon Manufacturing

Area: 1.14 Ac.

Construction Activities

1. None

Key WDIG Agreements

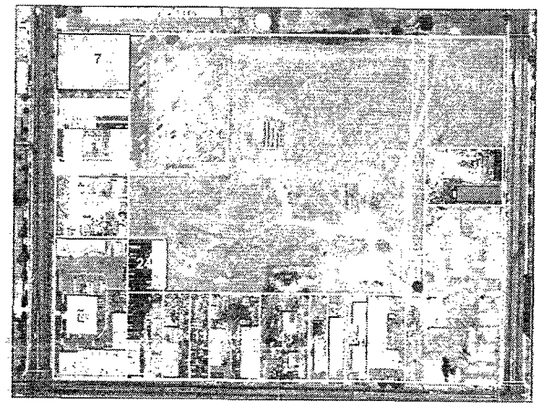
1. Not necessary

Key Tenant/Owner Agreements

1. Not necessary

Final Version: 2-24-04

No work on property.



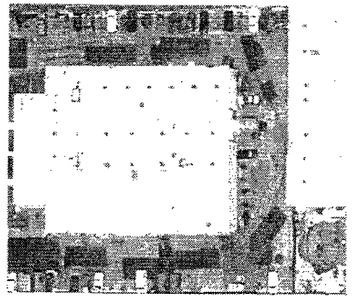
NOTE: Photograph from 1998.

Health and Safety

- None

Access and Security

- Access:
  - None
- Security:
  - None



NOTE: Photograph from 1998.

Legend

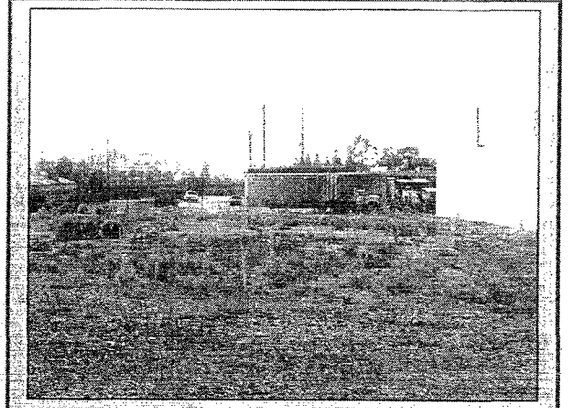
- RCRA SUBTITLE C-EQUIVALENT CAP AREA — DETAIL 4 (9|10)
- RCRA SUBTITLE D-EQUIVALENT COVER AREA — DETAIL 5 (9|10)
- REMOVE EXISTING ASPHALT AND REPLACE WITH ENGINEERED ASPHALT COVER — DETAIL 6 (9|10)
- 2" ASPHALT OVERLAY COVER — DETAIL 6A (9|10)
- REMOVE EXISTING CONCRETE AND REPLACE WITH ENGINEERED CONCRETE COVER — DETAIL 7 (9|10)
- ENGINEERED CONCRETE COVER WITH SEALED CRACKS — DETAIL 7A (9|10)
- SEAL ASPHALT AND RESTRIPE

Contact Information

1. EPA Community Relations Coordinator: Hector Aguirre, 415.972.3238
2. WDIG Project Manager: Roberto Puga, 714.449.8922
3. Gene Welter, 562.944.0291

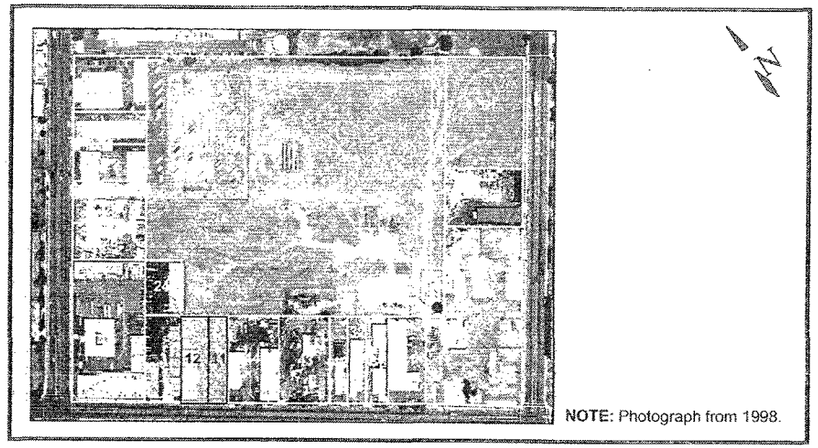
PROJECT

PARCEL NOS. 11/12 SPECIFIC WORKPLAN



NOTE: Photograph is current.

	Task Name	Duration	Start	Finish
161	Parcel #11/12	11 days	Mon 3/29/04	Mon 4/12/04
162	Site preparation	5 days	Mon 3/29/04	Fri 4/2/04
163	Seal existing concrete	2 days	Mon 4/5/04	Tue 4/6/04
164	Install asphalt concrete	4 days	Wed 4/7/04	Mon 4/12/04



NOTE: Photograph from 1998.

Parcel Information

Parcel No. APN 8167-002-011, APN 8167-002-012
Owner: AAG Metal Industries
Tenants: AAG Metal Industries
Area: 0.98 Ac.

Construction Activities

1. Seal cracks on outside of building
2. Pour new concrete as necessary with same thickness as existing concrete
3. Install RCRA Subtitle D-Equivalent cap (GCL or asphalt)
4. Seal cracks on existing engineered concrete cover
5. Install 1 new Bio-Vent well on Parcel 12, BW-15

Key WDIG Agreements

1. Maintain existing drainage
2. Fence improvement at the back of property
3. Provide paving estimate for the front of the site

Key Tenant/Owner Agreements

1. None

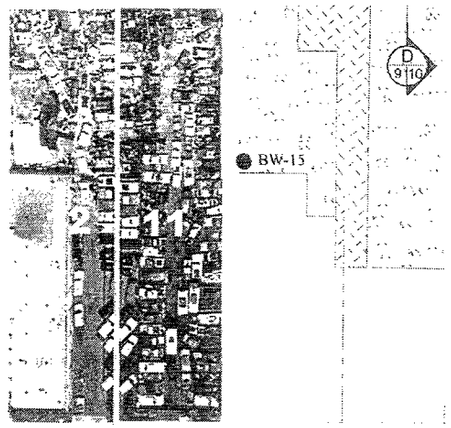
Final Version: 2-24-04

Health and Safety

- Tenant agrees to keep personnel and equipment out of remedial construction area during performance of the work.

Access and Security

- Access:
  - Allow remedial contractors access to work area during scheduled work day
- Security:
  - Coordinate security procedures with tenant/owner prior to beginning work



NOTE: Photograph from 1998.

Legend

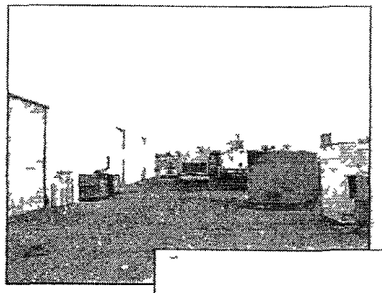
- RCRA SUBTITLE C-EQUIVALENT CAP AREA — DETAIL 4 (9|10)
- RCRA SUBTITLE D-EQUIVALENT COVER AREA — DETAIL 5 (9|10)
- REMOVE EXISTING ASPHALT AND REPLACE WITH ENGINEERED ASPHALT COVER — DETAIL 6 (9|10)
- 2" ASPHALT OVERLAY COVER — DETAIL 6A (9|10)
- REMOVE EXISTING CONCRETE AND REPLACE WITH ENGINEERED CONCRETE COVER — DETAIL 7 (9|10)
- ENGINEERED CONCRETE COVER WITH SEALED CRACKS — DETAIL 7A (9|10)
- SEAL ASPHALT AND RESTRIPE

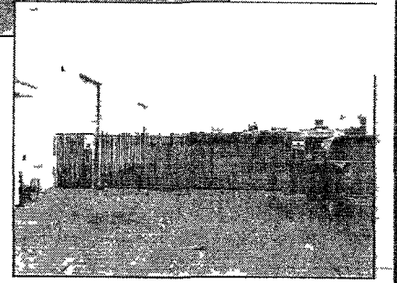
Contact Information

1. EPA Community Relations Coordinator: Hector Aguirre, 415.972.3238
2. WDIG Project Manager: Roberto Puga, 714.449.8922
3. AAG Metal Industries: Albert Leung, 562.698.9762

PROJECT

PARCEL NO. 21 SPECIFIC WORKPLAN





NOTE Photographs are current

Parcel Information

Parcel No	APN 8167-002 021
Owner	Lucille F Ferris Living Trust
Tenants	Chillers Services
Area	0 57 Ac

Construction Activities

1 Strip asphalt overlay and repair/replace concrete as necessary
2 Building foundation sealing
3. Seal cracks on existing engineered concrete cover

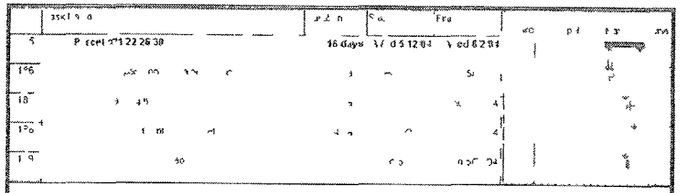
Key WDIG Agreements

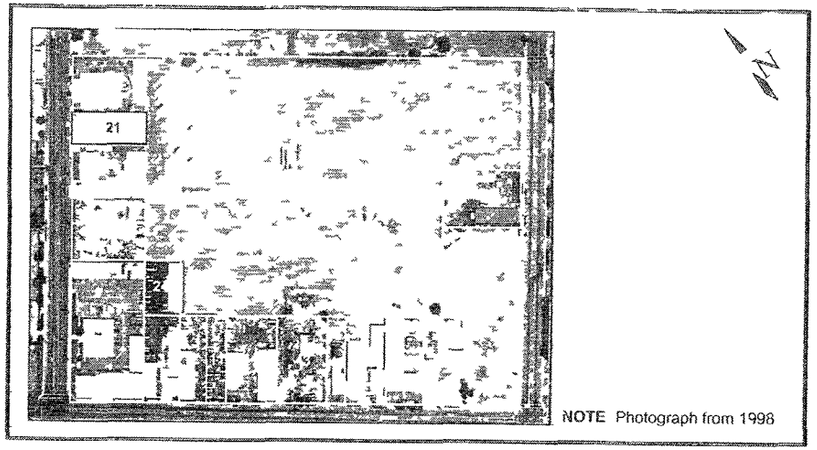
1 Maintain drainage to street

Key Tenant/Owner Agreements

1 Tenant to move containers and cranes at back of site

Final Version 2 24 04





NOTE Photograph from 1998

Health and Safety

- Tenant agrees to keep personnel and equipment out of remedial construction area during performance of the work
- Attached is a fact sheet containing information on the epoxy compound that will be used to seal and insulate the building foundation

Access and Security

- Access
  - Allow remedial contractors access to work area during scheduled work day
- Security
  - Coordinate security procedures with tenant/owner prior to beginning work

NOTE Photograph from 1998

Legend

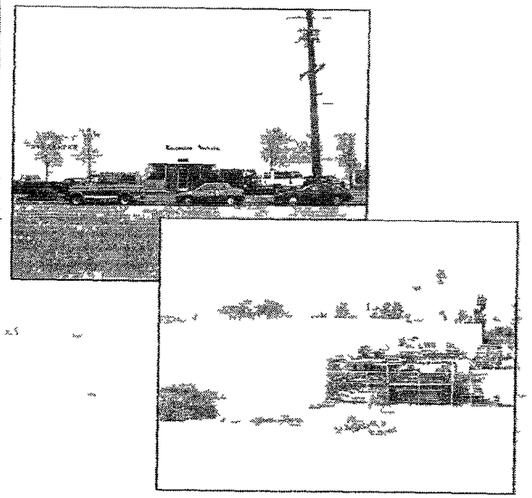
- R RA SUBTITLE C EQUIVALEN CAP AREA — DETAIL 4 (9|10)
- RCRA SUBTITLE D EQUIVALENT COVER AREA — DETAIL 5 (9|10)
- REMOVE EXISTING ASPHALT AND REPLACE WITH ENGINFERED ASPHALT COVER — DETAIL 6 (9|10)
- 2 ASPHALT OVERLAY COVER — DETAIL 6A (9|10)
- REMOVE EXSTING CONCRETE AND REPLACE WITH ENGINEERED CONCRETE COVER — DETAIL 7 (9|10)
- ENGINEERED CONCRETE COVER WITH SEALED CRACKS — DETAIL 7A (9|10)
- SEAL ASPHALT AND RESTRIPE

Contact Information

1 EPA Community Relations Coordinator Hector Aguirre 415 972 3238 2 WDIG Project Manager Roberto Puga 714 449 8922 3 Chillers Services 562 906 0105

PROJECT

PARCEL NO. 22 SPECIFIC WORKPLAN



NOTE Photographs are current

Parcel Information

Parcel No APN 81z67-002 022
Owner John I Maple Family Partnership
Tenants Gold Coast Refractory
Area 0 64 Ac

Construction Activities

1 Building foundation sealing

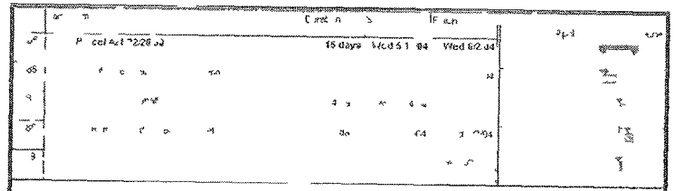
Key WDIG Agreements

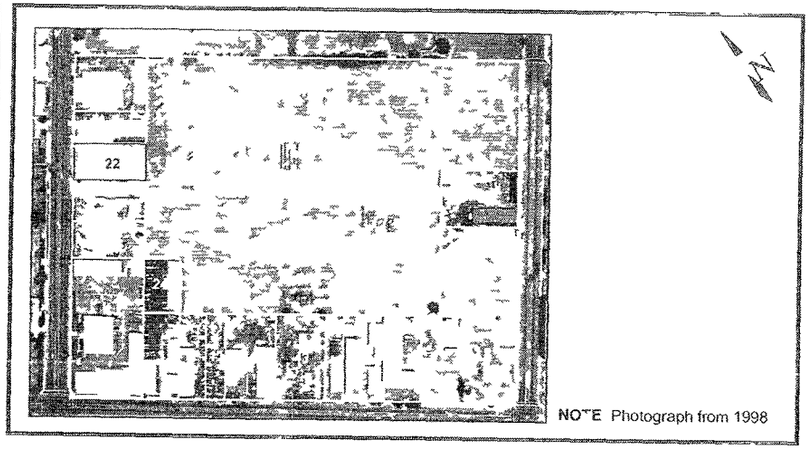
1 Look at increasing capacity of storm water drainage in adjacent right-of-way

Key Tenant/Owner Agreements

1 None

Final Version 2 24 04





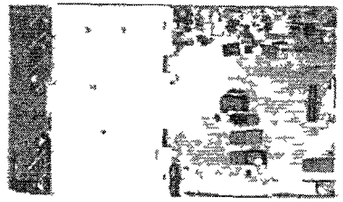
NOTE Photograph from 1998

Health and Safety

- Tenant agrees to keep personnel and equipment out of remedial construction area during performance of the work
- Attached is a fact sheet containing information on the epoxy compound that will be used to seal and insulate the building foundation

Access and Security

- Access
  - Allow remedial contractors access to work area during scheduled work day
- Security
  - Coordinate security procedures with tenant/owner prior to beginning work



NOTE Photograph from 1998

Legend

RCRA SUBTITLE C EQUIVALENT CAP AREA
DETAIL 4 / 9 | 0

RCRA SUBTITLE D EQUIVALENT COVER AREA
DETAIL 5 / 9 | 10

REMOVE EXISTING ASPHALT AND REPLACE WITH ENGINEERED ASPHALT COVER
DETAIL 6 / 9 | 10

ASPHALT OVERLAY COVER
DETAIL 6A / 9 | 10

REMOVE EXISTING CONCRETE AND REPLACE WITH ENGINEERED CONCRETE COVER
DETAIL 7 / 9 | 10

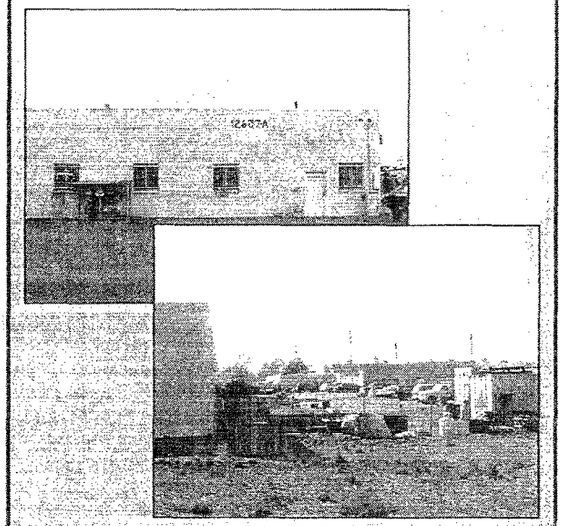
ENGINEERED CONCRETE COVER WITH SEALED CRACKS
DETAIL 7A / 9 | 0

SEAL ASPHALT AND RESTRIPE

Contact Information

PROJECT

PARCEL NO. 24, Buffalo Bullet - Unit #1 - SPECIFIC WORKPLAN



NOTE: Photographs are current.

Parcel Information

Parcel No. APN 8167-002-024
Owner: *Raymond & Donnis Holbrook Trust*
Tenants: Buffalo Bullet
Area: 0.46 Ac. (Total for Parcel #24)

Construction Activities

1. Seal transverse crack in floor of warehouse
2. Seal gap between walls and floor with epoxy as there is a ¼" separation from the wall away from the slab
3. 2" asphalt overlay adjacent to building
4. Install 1 Bio-Vent well, BW-20

Key WDIG Agreements

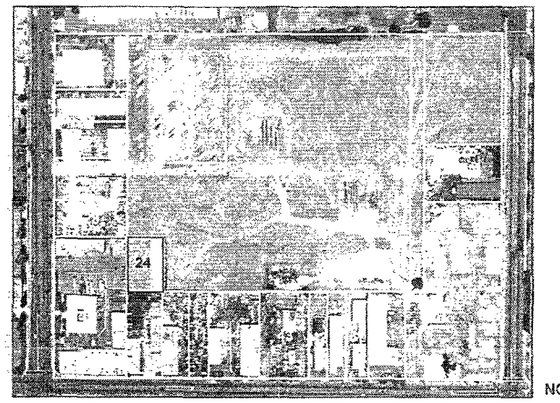
1. Perform work near compressor during weekend
2. Try to perform work without moving the compressor

Key Tenant/Owner Agreements

1. Possibly move the rack in rear of building

Final Version: 2-24-04

	Task Name	Duration	Start	Finish
169	Parcel #24	12 days	Mon 4/12/04	Tue 4/27/04
170	Site preparation	4 days	Mon 4/12/04	Thu 4/15/04
171	Remove and replace asphalt (weekend)	2 days	Fri 4/16/04	Mon 4/19/04
172	Seal interior floor slabs (weekend)	2 days	Fri 4/16/04	Mon 4/19/04
173	Asphalt overlay	6 days	Tue 4/20/04	Tue 4/27/04



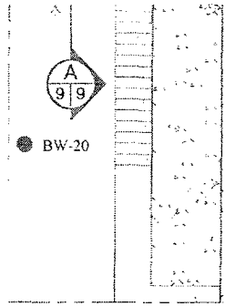
NOTE: Photograph from 1998.

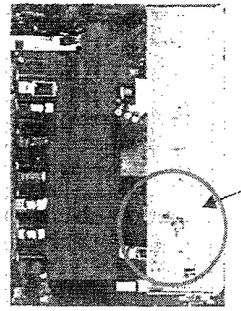
Health and Safety

- Tenant agrees to keep personnel and equipment out of *remedial construction area during performance of the work.*
- Attached is a fact sheet containing information on the epoxy compound that will be used to seal and insulate the building foundation.

Access and Security

- Access:
  - Allow remedial contractors access to work area during scheduled work day
- Security:
  - Coordinate security procedures with tenant/owner prior to beginning work





NOTE: Photograph from 1998.

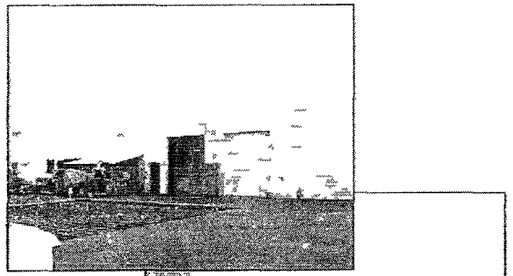
Legend

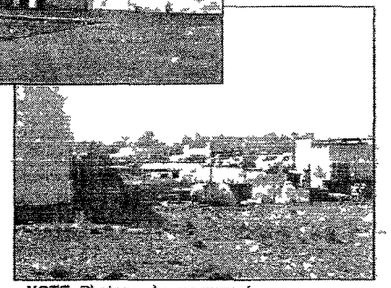
- RCRA SUBTITLE C-EQUIVALENT CAP AREA — DETAIL 4 (9|10)
- RCRA SUBTITLE D-EQUIVALENT COVER AREA — DETAIL 5 (9|10)
- *REMOVE EXISTING ASPHALT AND REPLACE WITH ENGINEERED ASPHALT COVER* — DETAIL 6 (9|10)
- 2" ASPHALT OVERLAY COVER — DETAIL 6A (9|10)
- REMOVE EXISTING CONCRETE AND REPLACE WITH ENGINEERED CONCRETE COVER — DETAIL 7 (9|10)
- ENGINEERED CONCRETE COVER WITH SEALED CRACKS — DETAIL 7A (9|10)
- SEAL ASPHALT AND RESTRIPE

Contact Information

1. EPA Community Relations Coordinator: Hector Aguirre, 415.972.3238
2. WDIG Project Manager: Roberto Puga, 714.449.8922
3. Buffalo Bullet : Ronald Dahlitz, 562.944.0322

PARCEL NO. 24, C&E Metal Products - Unit #2 - SPECIFIC WORKPLAN





NOTE Photographs are current

Parcel Information

Parcel No APN 8167-002- 024
Owner Raymond & Dennis Holbrook Trust
Tenants C&E Metal Products Inc
Area 0 46 Ac (Total for Parcel #24)

Construction Activities

1 Improve drainage in rear of parcel (Northern end)
2. Seal gap between walls and floor with epoxy
3 Replace asphalt paving with engineered asphalt cover
4 Install 1 Bio-Vent well BW-20

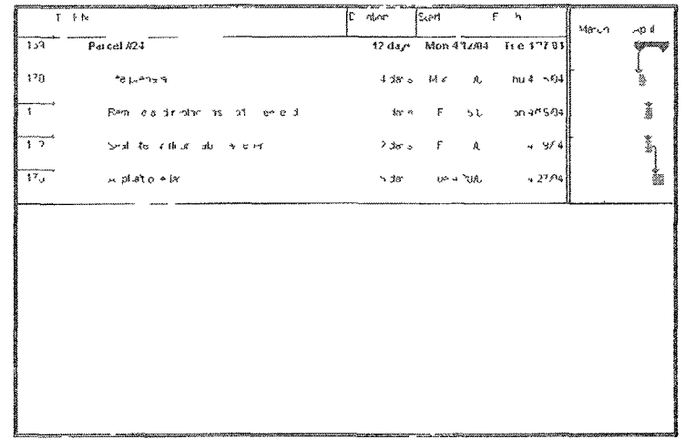
Key WDIG Agreements

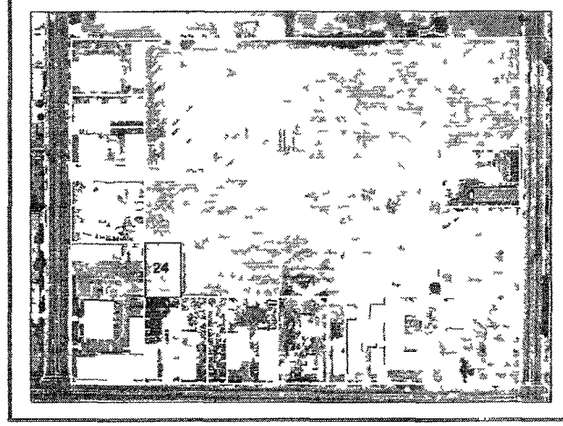
1 Beware of ultra-sensitive equipment in backroom, bring in construction consultant to see if epoxy can be injected through a nozzle in this area
2 Expand asphalt replacement area toward west side of parcel
3 Revisit site to assess extent of concrete apron after Holbrook work
4 Work over the weekend for the fenced compressor area

Key Tenant/Owner Agreements

1 None

Final Version 2 24 04





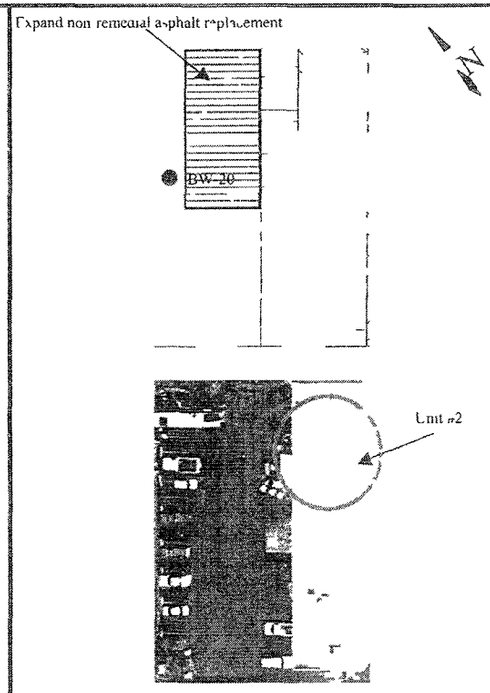
NOTE Photograph from 1998

Health and Safety

- Tenant agrees to keep personnel and equipment out of remedial construction area during performance of the work
- Attached is a fact sheet containing information on the epoxy compound that will be used to seal and insulate the building foundation

Access and Security

- Access
  - Allow remedial contractors access to work area during scheduled work day
- Security
  - Coordinate security procedures with tenant/owner prior to beginning work



NOTE Photograph from 1998

Legend

RCRA SUBTITLE C EQUIVALENT CAP AREA
DETAIL 4 | 9 | 10

RCRA SUBTITLE D EQUIVALENT COVER AREA
DETAIL 5 | 9 | 10

REMOVE EXISTING ASPHALT AND REPLACE WITH ENGINEERED ASPHALT COVER
DETAIL 6 | 9 | 10

2 ASPHALT OVERLAY COVER
DETAIL 6A | 9 | 10

REMOVE EXISTING CONCRETE AND REPLACE WITH ENGINEERED CONCRETE COVER
DETAIL 7 | 9 | 10

ENGINEERED CONCRETE COVER WITH SEALED CRACKS
DETAIL 7A | 9 | 10

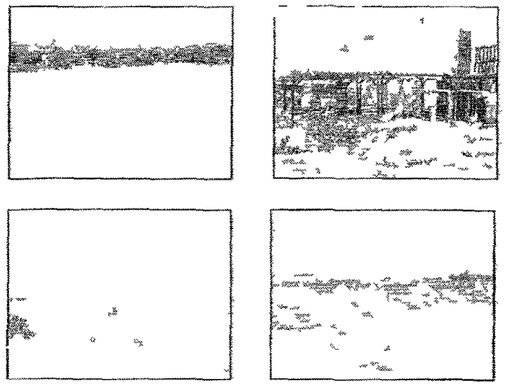
SEAL ASPHALT AND RESTRIPE

Contact Information

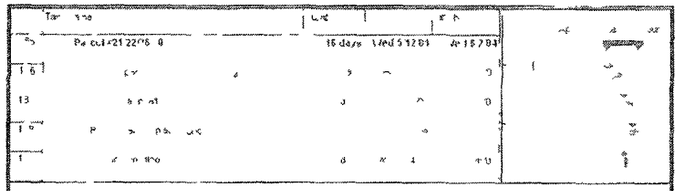
415 972 3238 2 WDIG Project Manager Roberto R za 714 449 8922 3 C&E Metal Products Dean Miller 562 946 6601

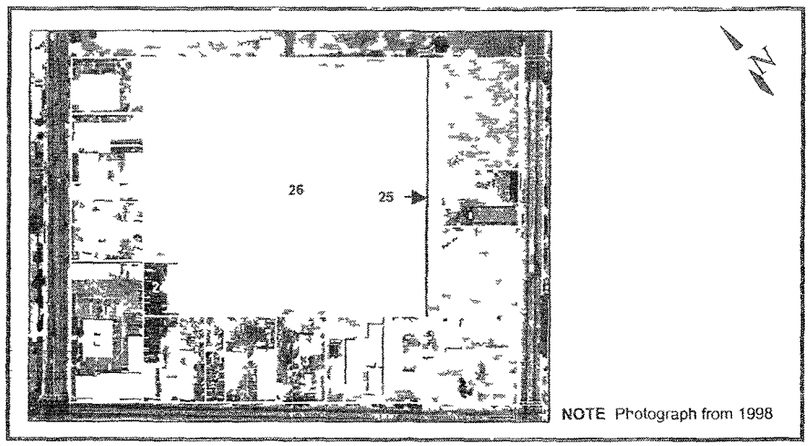
PROJECT NAVIGATOR LTD

PARCEL NOS. 25/26 SPECIFIC WORKPLAN



NOTE Photographs are current.





NOTE Photograph from 1998

Parcel Information

Parcel No APN 8167-002- 025 APN 8167-002- 026
Owner Pitts Grandchildren s Trust
Tenants None
Area 18 03 Ac

Construction Activities

1 Install RCRA Subtitle C Equivalent cap
2 Install RCRA Subtitle D-Equivalent cap
3 Install gas collection system
4 Install 2" asphalt overlay cover
5 Install 5 Bio-Vent wells BW-1, 2, 6 23, 24, 25
6 Install 4 leachate collection wells LW 1, 2, 3, 4
7 26 existing wells to be abandoned
8 Drum handling and removal
9 Construct access road
10 Install landscaping screen
11 Install foul-ball fence
12 Install storm water drain and catch basin

Key WDIG Agreements

1 Remove existing fence and store on pallets Use some of this to enclose the container area during construction Place enclosure on top of the slope above the container area
2 Move to existing fence on NW side from toe of slope to crest of slope
3 Tear down abandoned structures on Parcel #25
4 Provide equipment for tenant to move containers
5 Dispose of batteries and drill press

Key Tenant/Owner Agreements

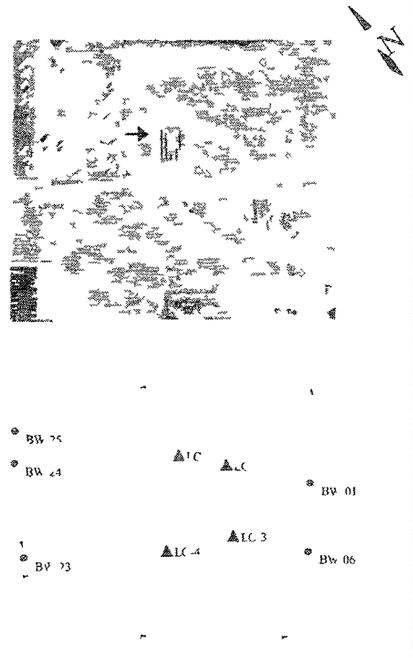
1 Tenant to move containers (Group will give advanced notice)

Health and Safety

- Tenant agrees to keep personnel and equipment out of remedial construction area during performance of the work

Access and Security

- Access
  - Allow remedial contractors access to work area during scheduled work day
- Security
  - Coordinate security procedures with tenant/owner prior to beginning work



NOTE Most vehicles have been removed from the RV lot

Legend

RCRA SUBTITLE C EQUIVALENT CAP AREA DETAIL 4 ○ 10

R RA SUBTITLE D EQUIVALEN COVER AREA DETAIL 5 ○ 10

REMOVE EXISTING ASPHALT AND REPLACE V TH ENGINEERED ASPHALT COVER DETAIL 6 9 10

2 ASPHALT OVERLAY COVER DETAIL 6A ○ 10

REMOVE EXIS ING CONCRETE AND REPLACE W TH ENGINEERED CONCRETE COVER DETAIL 7 9 10

ENGINEERED CONCRETE COVER WITH SEALED CRACKS DETAIL 7A 9 10

SEAL ASPHALT AND RESTRIPE

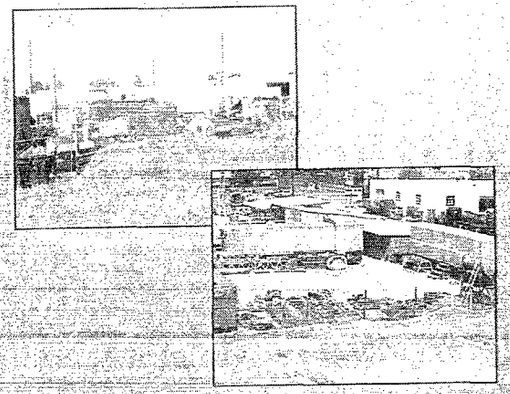
Final Version 2-24-04

Contact Information

2 WDIC Project Manager Roberto Puga 714 419 8922 3 Marvin Pitts 562 945 7949

PROJECT NAVIGATOR, LTD.

PARCEL NOS. 28/29 SPECIFIC WORKPLAN



NOTE: Photographs are current.

Parcel Information

Parcel No. APN 8167-002-028, APN 8167-002-029
Owner: Thomas J. Mersits, Irene L. Mersits Trust
Tenants: Mersits Equipment
Area: 1.18 Ac.

Construction Activities

1. Install RCRA Subtitle D-Equivalent cap on Parcel 29
2. Remove existing concrete as necessary in Northern portion portion and replace with portion of engineered concrete cover
3. Seal cracks on existing engineered concrete cover

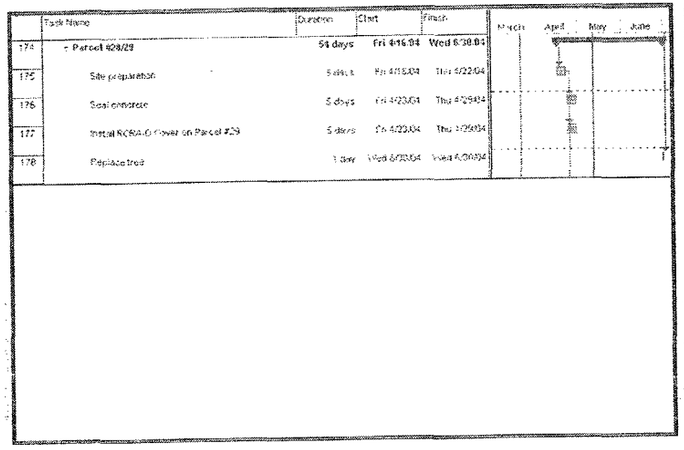
Key WDIG Agreements

1. Remove palm tree and planter; plant a Ficus tree similar to the one already on the property. The new tree should be outside the fence line, symmetrical with the first tree.
2. Be cautious with sprinkler, water lines and spigots (PVC, 50 ft. spacing)
   a. There is a sewer line 6" thick in diameter and cuts at an angle toward the office bldg according to the owner
3. Grade area and match existing elevation
4. Leave RCRA Subtitle D-Equivalent cap bare dirt
5. Concrete specialist to make recommendation on replacement of concrete

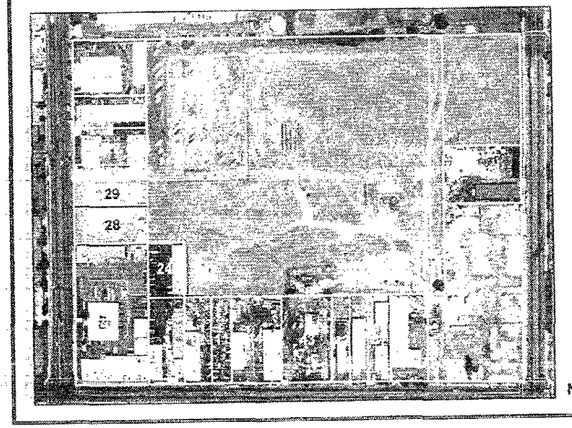
Key Tenant/Owner Agreements

1. Allow contractor to move equipment as necessary

Final Version: 2-24-04



	Task Name	Duration	Start	Finish
174	- Parcel 28/29	54 days	Fri 4/16/04	Wed 6/30/04
175	Site preparation	5 days	Fri 4/16/04	Thu 4/22/04
176	Seal concrete	5 days	Fri 4/23/04	Thu 4/29/04
177	Install RCRA-D Cover on Parcel #29	5 days	Fri 4/23/04	Thu 4/29/04
178	Replace tree	1 day	Wed 6/30/04	Wed 6/30/04



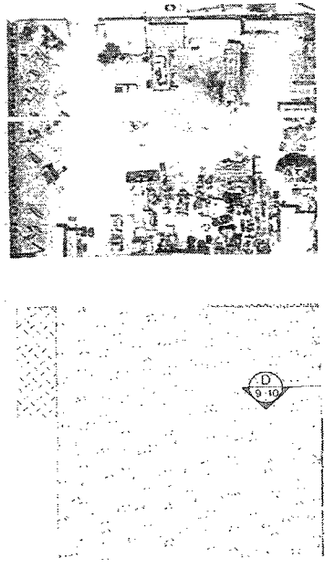
NOTE: Photograph from 1998.

Health and Safety

- Tenant agrees to keep personnel and equipment out of remedial construction area during performance of the work.

Access and Security

- Access:
  - Allow remedial contractors access to work area during scheduled work day
- Security:
  - Coordinate security procedures with tenant/owner prior to beginning work



NOTE: Photograph from 1998.

Legend

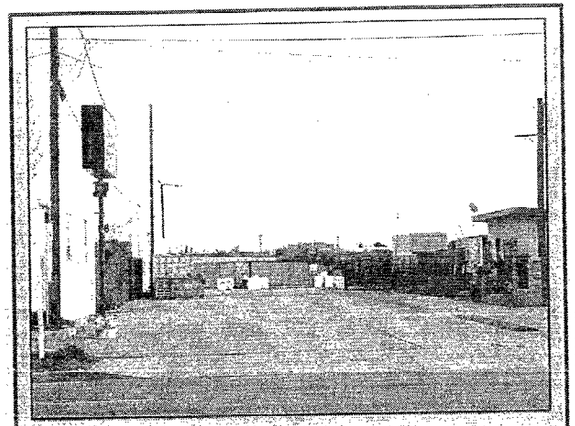
- RCRA SUBTITLE C-EQUIVALENT CAP AREA — DETAIL 4 (9 | 10)
- RCRA SUBTITLE D-EQUIVALENT COVER AREA — DETAIL 5 (9 | 10)
- REMOVE EXISTING ASPHALT AND REPLACE WITH ENGINEERED ASPHALT COVER — DETAIL 6 (9 | 10)
- 2" ASPHALT OVERLAY COVER — DETAIL 6A (9 | 10)
- REMOVE EXISTING CONCRETE AND REPLACE WITH ENGINEERED CONCRETE COVER — DETAIL 7 (9 | 10)
- ENGINEERED CONCRETE COVER WITH SEALED CRACKS — DETAIL 7A (9 | 10)
- SEAL ASPHALT AND RESTRIPE

Contact Information

2. WDIG Project Manager: Roberto Puga, 714.449.8922
3. Mersits Equipment: Tom Mersits: 562.946.5707

PROJECT NAVIGATOR LTD.

PARCEL NO. 30 SPECIFIC WORKPLAN



NOTE: Photograph is current.

Parcel Information

Parcel No. APN 8167-002-030
Owner: Pitts Grandchildren's Trust,
Thomas J. Mersits, Irene L. Mersits Trust
Tenants: None
Area: 0.14 Ac.

Construction Activities

1. Remove existing concrete and replace with engineered concrete cover

Key WDIG Agreements

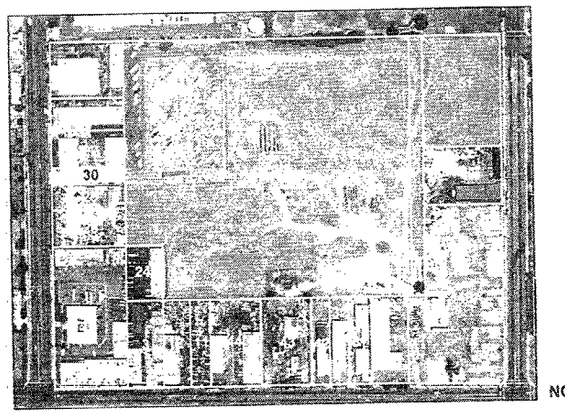
1. Look into improving drainage
2. Replace white pylons in front of gate with concrete-filled yellow bollards
3. Run an electrical conduit underneath the concrete and find place to mount gate key pad (card reader)
4. Maintain drainage between Parcel #30 and try to move existing asphalt swale to South boundary

Key Tenant/Owner Agreements

1. None

Final Version: 2-24-04

	Task Name	Duration	Start	Finish
185	Parcel #21/22/26/30	15 days	Wed 5/12/04	Wed 6/2/04
186	Site preparation, container moving	3 days	Wed 5/12/04	Fri 5/21/04
187	Overlay Asphalt	4 days	Mon 5/24/04	Thu 5/27/04
188	Remove and replace concrete	4 days	Fri 5/28/04	Wed 6/2/04
189	Seal exterior flow lines	3 days	Mon 5/24/04	Wed 5/26/04



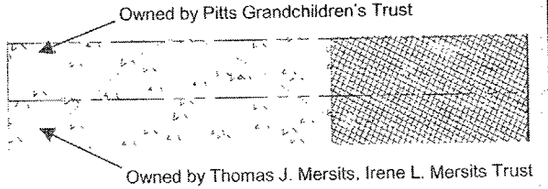
NOTE: Photograph from 1998.

Health and Safety

- Tenant agrees to keep personnel and equipment out of remedial construction area during performance of the work.

Access and Security

- Access:
  - Allow remedial contractors access to work area during scheduled work day
- Security:
  - Coordinate security procedures with tenant/owner prior to beginning work



NOTE: Photograph from 1998.

Legend

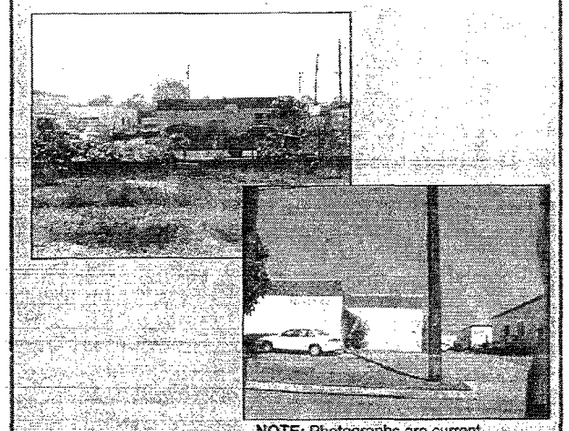
- RCRA SUBTITLE C-EQUIVALENT CAP AREA — DETAIL 4 (9|10)
- RCRA SUBTITLE D-EQUIVALENT COVER AREA — DETAIL 5 (9|10)
- REMOVE EXISTING ASPHALT AND REPLACE WITH ENGINEERED ASPHALT COVER — DETAIL 6 (9|10)
- 2" ASPHALT OVERLAY COVER — DETAIL 6A (9|10)
- REMOVE EXISTING CONCRETE AND REPLACE WITH ENGINEERED CONCRETE COVER — DETAIL 7 (9|10)
- ENGINEERED CONCRETE COVER WITH SEALED CRACKS — DETAIL 7A (9|10)
- SEAL ASPHALT AND RESTRIPE

Contact Information

1. Project Coordinator: Hector Aguirre, 415.972.3238
2. WDIG Project Manager: Roberto Puga, 714.449.8922
3. Marvin Pitts: 562.945.7949; Tom Mersits: 562.946.5707

PROJECT NAVIGATOR LTD.

PARCEL NO. 32 SPECIFIC WORKPLAN



NOTE: Photographs are current

Parcel Information

Parcel No.: APN 8167-002-032
Owner: David Joseph Neptune Family Trust
Tenants: California Reamers
Area: 0.47 Ac.

Construction Activities

1. Building inspection
2. Building foundation sealing (if necessary)
3. Remove existing asphalt and replace with engineered asphalt cover
4. Install 1 new Bio-Vent well, BW-13 as shown

Key WDIG Agreements

1. Not necessary

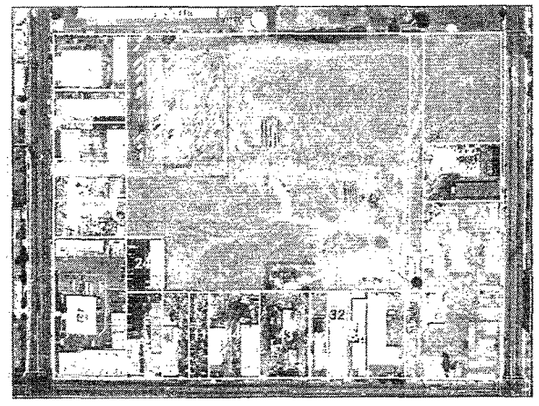
Key Tenant/Owner Agreements

1. Not necessary

Final Version: 2-24-04

	Task Name	Duration	Start	Finish
150	Parcel #37/32	10 days	Mon 3/22/04	Fri 4/2/04
151	Site Preparation	5 days	Mon 3/22/04	Fri 3/26/04
152	Remove and replace asphalt	5 days	Mon 3/29/04	Fri 4/2/04
153	Seal interior floor slab	5 days	Mon 3/29/04	Fri 4/2/04

March | April



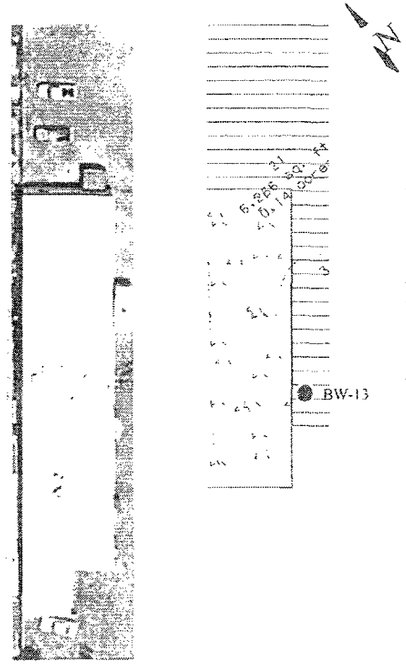
NOTE: Photograph from 1998.

Health and Safety

- Tenant agrees to keep personnel and equipment out of remedial construction area during performance of the work.
- Attached is a fact sheet containing information on the epoxy compound that will be used to seal and insulate the building foundation.

Access and Security

- Access:
  - Allow remedial contractors access to work area during scheduled work day
- Security:
  - Coordinate security procedures with tenant/owner prior to beginning work



NOTE: Photograph from 1998.

Legend

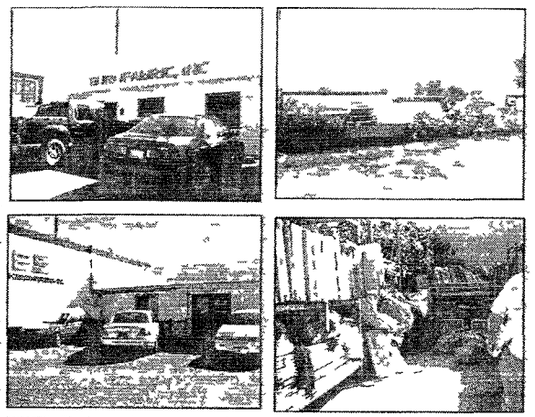
- RCRA SUBTITLE C-EQUIVALENT CAP AREA — DETAIL 4 (9|10)
- RCRA SUBTITLE D-EQUIVALENT COVER AREA — DETAIL 5 (9|10)
- REMOVE EXISTING ASPHALT AND REPLACE WITH ENGINEERED ASPHALT COVER — DETAIL 6 (9|10)
- 2" ASPHALT OVERLAY COVER — DETAIL 6A (9|10)
- REMOVE EXISTING CONCRETE AND REPLACE WITH ENGINEERED CONCRETE COVER — DETAIL 7 (9|10)
- ENGINEERED CONCRETE COVER WITH SEALED CRACKS — DETAIL 7A (9|10)
- SEAL ASPHALT AND RESTRIPE

Contact Information

1. EPA Community Relations Coordinator: Hector Aguirre, 415.972.3238
2. WDIG Project Manager: Roberto Puga, 714.449.8922
3. California Reamers: Dave Neptune, 562.946.6377

PROJECT NAVIGATOR LTD.

PARCEL NO. 37 SPECIFIC WORKPLAN



NOTE Photographs are current

Parcel Information

Parcel No APN 8167-002-037
Owner Lula Graziano, Trustee, Jovita F Ortega
Tenants EuroFabrics
Area ~ 0 47 Ac

Construction Activities

1 Building inspection
2 Building foundation sealing
3 Remove existing asphalt and replace with engineered asphalt cover
4 Seal cracks on existing exterior engineered concrete cover

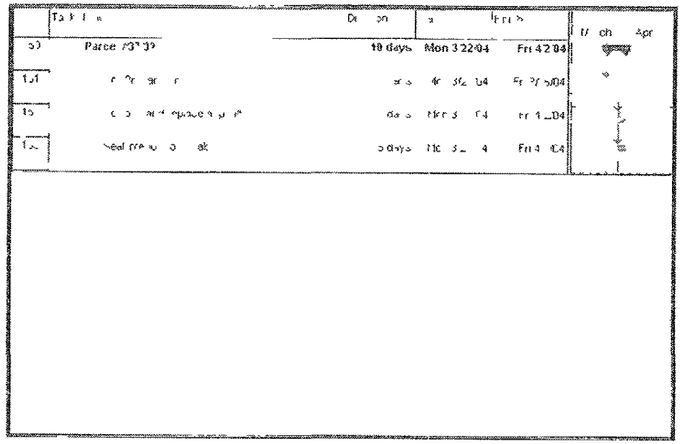
Key WDIG Agreements

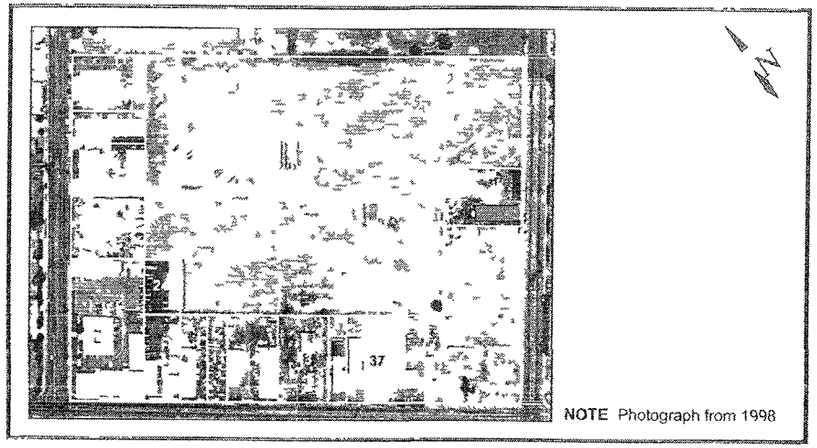
1 Asphalt setting will occur on a Saturday
2 Designate parking so that tenants do not have to park on the street
3 Take dust control precautions to control dust/dirt into the printing and garment areas
4 Provide asphalt paving estimate for the front portion of the parcel

Key Tenant/Owner Agreements

1 None

Final Version 2 24 04





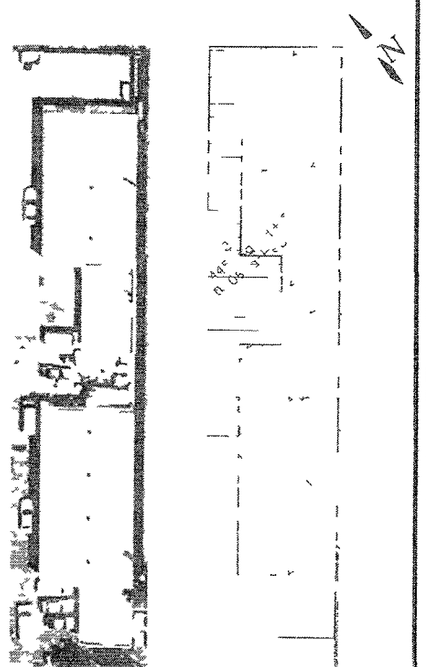
NOTE Photograph from 1998

Health and Safety

- Tenant agrees to keep personnel and equipment out of remedial construction area during performance of the work
- Attached is a fact sheet containing information on the epoxy compound that will be used to seal and insulate the building foundation

Access and Security

- Access
  - Allow remedial contractors access to work area during scheduled work day
- Security
  - Coordinate security procedures with tenant/owner prior to beginning work



NOTE Photograph from 1998

Legend

RCRA SUBTITLE C EQUIVALENT CAP AREA
DETAIL 4 | 9 | 10

RCRA SUBTITLE D EQUIVALENT COVER AREA
DETAIL 5 | 9 | 10

REMOVE EXISTING ASPHALT AND REPLACE WITH ENGINEERED ASPHALT COVER
DETAIL 6 | 9 | 10

2" ASPHALT OVERLAY COVER
DETAIL 6A | 9 | 10

REMOVE EXISTING CONCRETE AND REPLACE WITH ENGINEERED CONCRETE COVER
DETAIL 7 | 9 | 10

ENGINEERED CONCRETE COVER WITH SEALED CRACKS
DETAIL 7A | 9 | 10

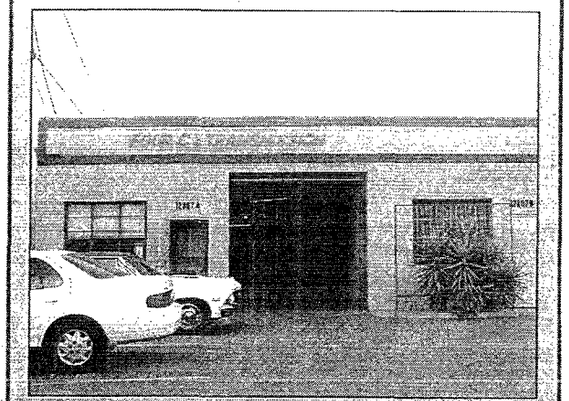
SEAL ASPHALT AND RESTRIPE

Contact Information

1 EPA Community Relations Coordinator Hector Aguirre 415 972 3238 2 WDIG Project Manager Roberto Puga 714 419 8922 3 EuroFabrics Rudy Chavez 562 777 0994

PROJECT NAVIGATOR LTD.

PARCEL NO. 41, Four C's Transmission - Unit #1 SPECIFIC WORKPLAN



NOTE: Photograph is current

Parcel Information

Parcel No.: APN 8167-002-041
Owner: Eugene & Geraldine Welter Trust
Tenants: Four C's Transmission
Area: 0.78 Ac. (Total for Parcel #41)

Construction Activities

1. Building foundation sealing (if necessary)
2. Reseal and stripe asphalt in front of building
3. Install 1 new Bio-Vent well, BW-12

Key WDIG Agreements

1. Clean swale on West side of building (currently soil and asphalt)
2. Perform work on weekend

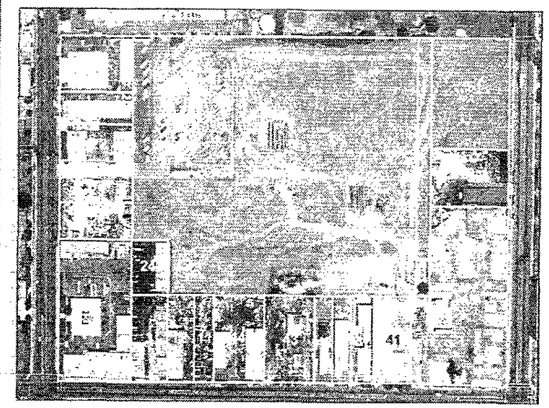
Key Tenant/Owner Agreements

1. None

Final Version: 2-24-04

	Task Name	Duration	Start	Finish
144	Parcel #41	15 days	Mon 3/22/04	Fri 4/9/04
145	Site Preparation (Tenants clear yard)	4 days	Mon 3/22/04	Thu 3/25/04
146	Remove and replace asphalt (First half over weekend)	2 days	Fri 3/26/04	Mon 3/29/04
147	Seal Interior Floor slabs (weekend work)	5 days	Tue 3/30/04	Mon 4/5/04
148	Remove and replace asphalt (Second half)	4 days	Tue 4/6/04	Fri 4/9/04
149	Side gutter (not on critical path)	2 days	Thu 4/1/04	Fri 4/2/04

March | April



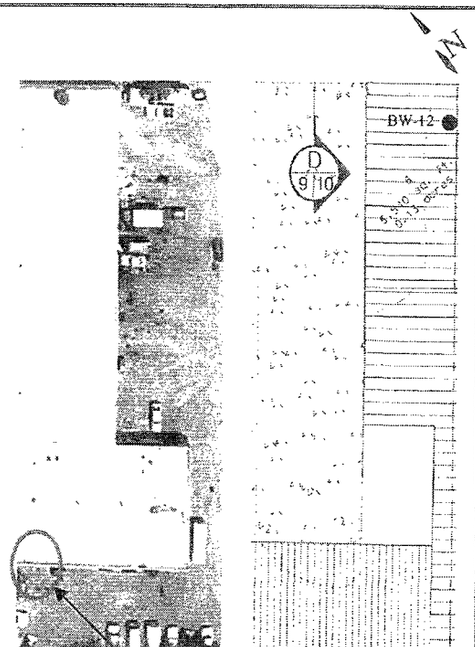
NOTE: Photograph from 1998.

Health and Safety

- Tenant agrees to keep personnel and equipment out of remedial construction area during performance of the work.
- Attached is a fact sheet containing information on the epoxy compound that will be used to seal and insulate the building foundation.

Access and Security

- Access:
  - Allow remedial contractors access to work area during scheduled work day
- Security:
  - Coordinate security procedures with tenant/owner prior to beginning work



Location of Four C's Transmission

NOTE: Photograph from 1998.

Legend

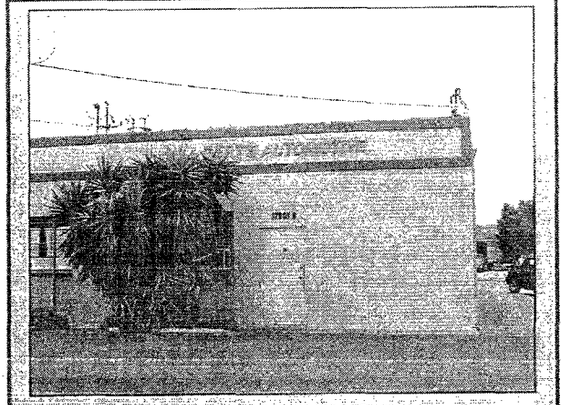
- RCRA SUBTITLE C-EQUIVALENT CAP AREA — DETAIL 4 (9 | 10)
- RCRA SUBTITLE D-EQUIVALENT COVER AREA — DETAIL 5 (9 | 10)
- REMOVE EXISTING ASPHALT AND REPLACE WITH ENGINEERED ASPHALT COVER — DETAIL 6 (9 | 10)
- 2" ASPHALT OVERLAY COVER — DETAIL 6A (9 | 10)
- REMOVE EXISTING CONCRETE AND REPLACE WITH ENGINEERED CONCRETE COVER — DETAIL 7 (9 | 10)
- ENGINEERED CONCRETE COVER WITH SEALED CRACKS — DETAIL 7A (9 | 10)
- SEAL ASPHALT AND RESTRIPE

Contact Information

1. EPA Community Relations Coordinator: Hector Aguirre, 415.972.3238
2. WDIG Project Manager: Roberto Puga, 714.449.8922
3. Four C's Transmission: Julian Neto, 562.946.9272

PROJECT NAVIGATOR, LTD.

PARCEL NO. 41, 2 Stage Enterprises - Unit #3 SPECIFIC WORKPLAN



NOTE: Actual business is located to the left of Bert's Automotive

Parcel Information

Parcel No.: APN 8167-002-041
Owner: Eugene & Geraldine Welter Trust
Tenants: 2 Stage Enterprises
Area: 0.78 Ac. (Total for Parcel #41)

Construction Activities

1. Seal asphalt and restripe
2. Install 1 new Bio-Vent well, BW-12
3. (Inspection indicates no cracks in foundation)

Key WDIG Agreements

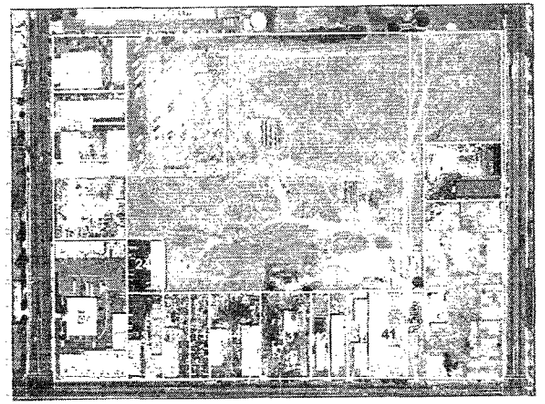
1. No work is required inside of the building

Key Tenant/Owner Agreements

1. None

Final Version: 2-24-04

	Task Name	Duration	Start	Finish
144	Parcel #41	15 days	Mon 3/22/04	Fri 4/9/04
145	Site Preparation (Tenants clear yard)	4 days	Mon 3/22/04	Thu 3/25/04
146	Remove and replace asphalt (First half over weekend))	2 days	Fri 3/26/04	Mon 3/29/04
147	Seal Interior Floor slabs (weekend work)	5 days	Tue 3/30/04	Mon 4/5/04
148	Remove and replace asphalt (Second half)	4 days	Tue 4/6/04	Fri 4/9/04
149	Side gutter (not on critical path)	2 days	Thu 4/1/04	Fri 4/2/04



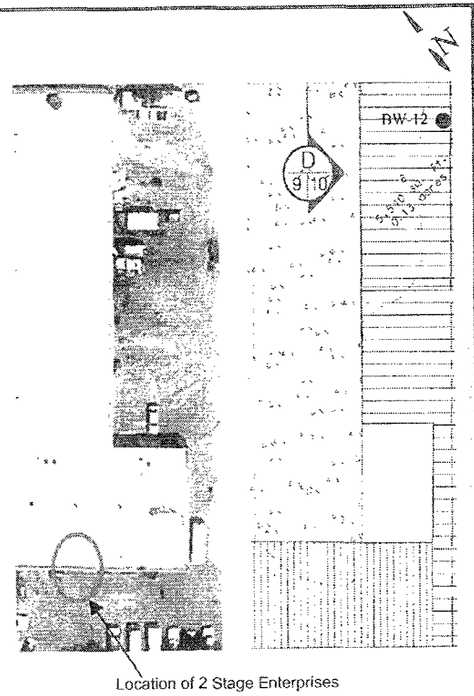
NOTE: Photograph from 1998.

Health and Safety

- Tenant agrees to keep personnel and equipment out of remedial construction area during performance of the work.

Access and Security

- Access:
  - Allow remedial contractors access to work area during scheduled work day
- Security:
  - Coordinate security procedures with tenant/owner prior to beginning work



Location of 2 Stage Enterprises

NOTE: Photograph from 1998.

Legend

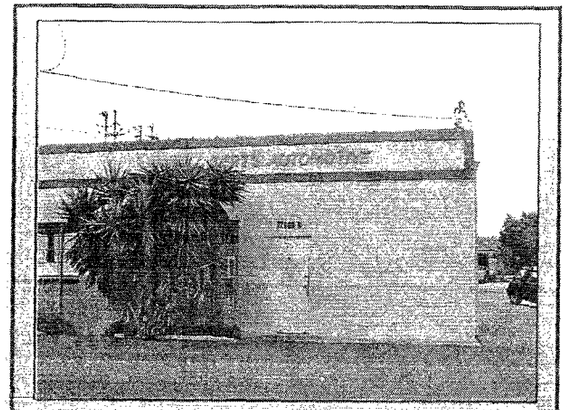
- RCRA SUBTITLE C-EQUIVALENT CAP AREA — DETAIL 4 (9|10)
- RCRA SUBTITLE D-EQUIVALENT COVER AREA — DETAIL 5 (9|10)
- REMOVE EXISTING ASPHALT AND REPLACE WITH ENGINEERED ASPHALT COVER — DETAIL 6 (9|10)
- 2" ASPHALT OVERLAY COVER — DETAIL 6A (9|10)
- REMOVE EXISTING CONCRETE AND REPLACE WITH ENGINEERED CONCRETE COVER — DETAIL 7 (9|10)
- ENGINEERED CONCRETE COVER WITH SEALED CRACKS — DETAIL 7A (9|10)
- SEAL ASPHALT AND RESTRIPE

Contact Information

1. EPA Community Relations Coordinator: Hector Aguirre, 415.972.3238
2. WDIG Project Manager: Roberto Puga, 714.449.8922
3. 2 Stage Enterprises: David Campion, 562.841.5149

PROJECT NAVIGATOR, LTD.

PARCEL NO. 41, Bert's Automotive - Unit #4 SPECIFIC WORKPLAN



NOTE: Photograph is current

Parcel Information

Parcel No. APN 8167-002-041
Owner: Eugene & Geraldine Welter Trust
Tenants: Bert's Automotive
Area: 0.78 Ac. (Total for Parcel #41)

Construction Activities

1. Remove existing asphalt and replace with engineered asphalt cover
3. Seal asphalt and restripe
4. Install 1 new Bio-Vent well, BW-12

Key WDIG Agreements

1. Perform work on weekend

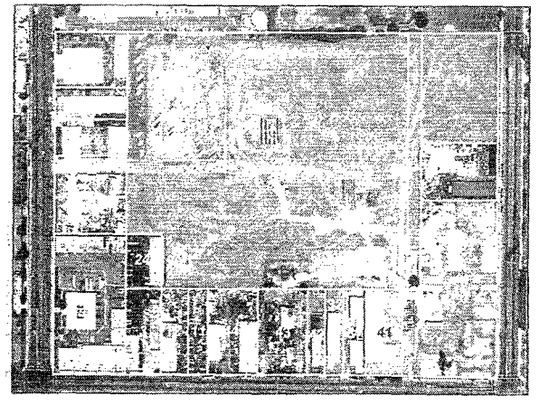
Key Tenant/Owner Agreements

1. None

Final Version: 2-24-04

	Task Name	Duration	Start	Finish
144	Parcel #41	15 days	Mon 3/22/04	Fri 4/9/04
145	Site Preparation (Tenants clear yard)	4 days	Mon 3/22/04	Thu 3/25/04
146	Remove and replace asphalt (First half over weekend))	2 days	Fri 3/26/04	Mon 3/29/04
147	Seal Interior Floor slabs (weekend work)	5 days	Tue 3/30/04	Mon 4/5/04
148	Remove and replace asphalt (Second half)	4 days	Tue 4/6/04	Fri 4/9/04
149	Side gutter (not on critical path)	2 days	Thu 4/1/04	Fri 4/2/04

March April



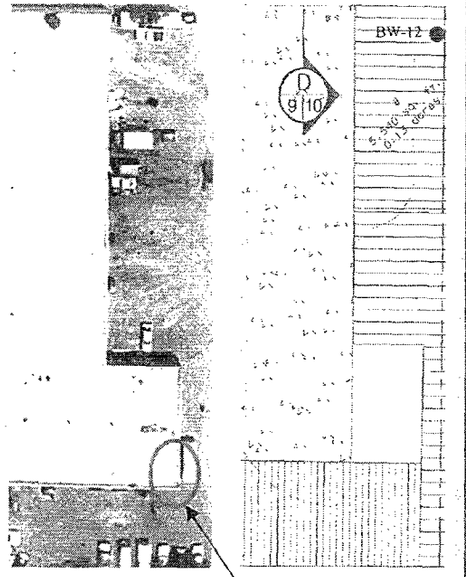
NOTE: Photograph from 1998.

Health and Safety

- Tenant agrees to keep personnel and equipment out of remedial construction area during performance of the work.
- Attached is a fact sheet containing information on the epoxy compound that will be used to seal and insulate the building foundation.

Access and Security

- Access:
  - Allow remedial contractors access to work area during scheduled work day
- Security:
  - Coordinate security procedures with tenant/owner prior to beginning work



NOTE: Photograph from 1998.

Legend

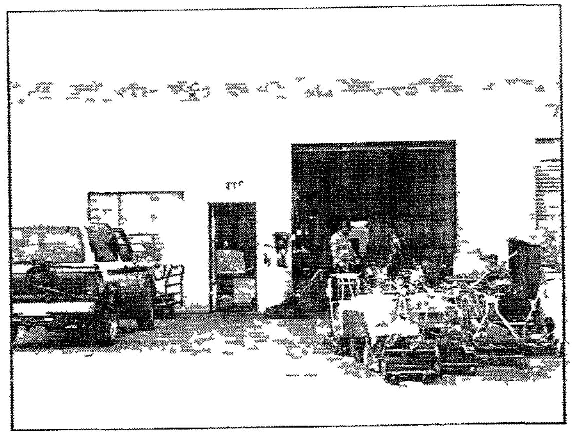
- RCRA SUBTITLE C-EQUIVALENT CAP AREA — DETAIL 4 (9 | 10)
- RCRA SUBTITLE D-EQUIVALENT COVER AREA — DETAIL 5 (9 | 10)
- REMOVE EXISTING ASPHALT AND REPLACE WITH ENGINEERED ASPHALT COVER — DETAIL 6 (9 | 10)
- 2" ASPHALT OVERLAY COVER — DETAIL 6A (9 | 10)
- REMOVE EXISTING CONCRETE AND REPLACE WITH ENGINEERED CONCRETE COVER — DETAIL 7 (9 | 10)
- ENGINEERED CONCRETE COVER WITH SEALED CRACKS — DETAIL 7A (9 | 10)
- SEAL ASPHALT AND RESTRIPE

Contact Information

1. EPA Community Relations Coordinator Hector Aguirre, 415.972.3238
2. WDIG Project Manager: Roberto Puga, 714.449.8922
3. Bert's Automotive: Bert Lowell, 562.941.4502

PROJECT NAVIGATOR, LTD.

PARCEL NO. 41, Leo's Lawnmower Shop - Unit #7 SPECIFIC WORKPLAN



NOTE Photograph is current

Parcel Information

Parcel No	APN 8167-002-041
Owner	Eugene & Geraldine Welter Trust
Tenants	Leo's Lawnmower Shop
Area	0 78 Ac (Total for Parcel #41)

Construction Activities

1. Seal cracks in building foundation
2. Remove existing asphalt and replace with engineered asphalt cover
3. Install 1 new Bio-Vent well, BW 12

Key WDIG Agreements

1. Place grout in existing bore holes within building interior
2. Rent storage container to place inventory during construction
3. Dig up legume tree and place in pot
4. Perform work on weekend

Key Tenant/Owner Agreements

1. Move inventory to supply container

Final Version 2 24-04

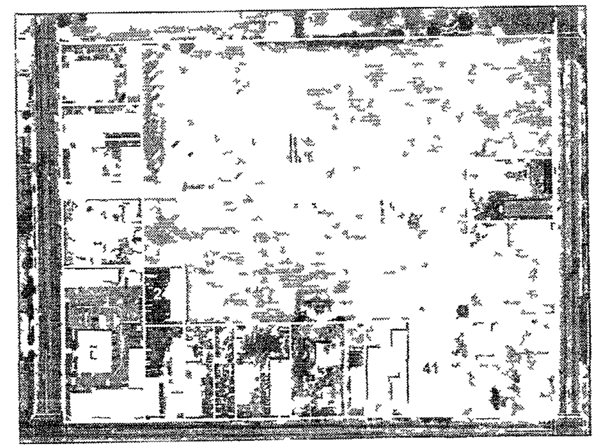
	Task Name	Duration	Start	Finish
14	Parcel #41	15 days	Mon 3/22/04	Fri 4/9/04
145	[illegible]	[illegible]	[illegible]	[illegible]
146	[illegible]	2 [illegible]	[illegible] 6 04	[illegible]
14	[illegible]	[illegible]	[illegible]	[illegible]
14o	[illegible]	4 [illegible]	Tu [illegible]	[illegible] 9 04
149	[illegible]	[illegible]	Thu [illegible] 04	Fri [illegible] 04

Health and Safety

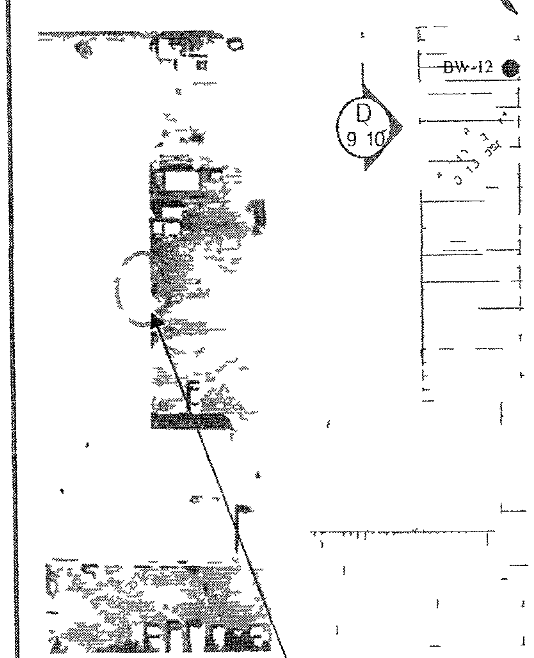
- Tenant agrees to keep personnel and equipment out of remedial construction area during performance of the work
- Attached is a fact sheet containing information on the epoxy compound that will be used to seal and insulate the building foundation

Access and Security

- Access
  - Allow remedial contractors access to work area during scheduled work day
- Security
  - Coordinate security procedures with tenant/owner prior to beginning work



NOTE Photograph from 1998



Location of Leo s Lawnmower Shop

NOTE Photograph from 1998

Legend

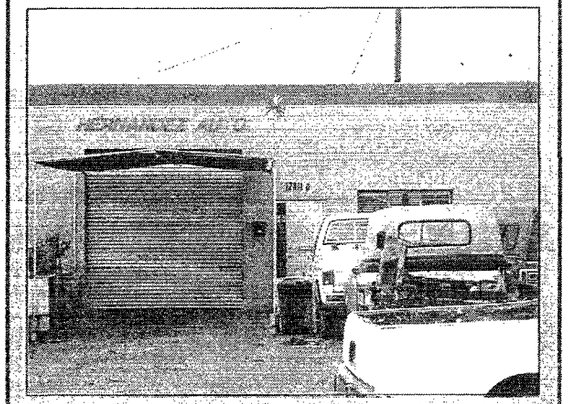
- RCRA SUBTITLE C-EQUIVALENT CAP AREA — DETAIL 4 / 9 10
- RCRA SUBTITLE D EQUIVALENT COVER AREA — DETAIL 5 / 9 10
- REMOVE EXISTING ASPHALT AND REPLACE WITH ENGINEERED ASPHALT COVER — DETAIL 6 / 9 10
- 2 ASPHALT OVERLAY COVER — DETAIL 6A / 9 10
- REMOVE EXISTING CONCRETE AND REPLACE WITH ENGINEERED CONCRETE COVER — DETAIL 7 / 9 10
- ENGINEERED CONCRETE COVER WITH SEALED CRACKS — DETAIL 7A / 9 10
- SEAL ASPHALT AND RESTRIPE

Contact Information

[illegible] 11b 972 3238 2 WDIG Project Manager Roberto Puga 714 449 8922 3 Leo s Lawnmower Shop Leo Rojas 562 944 0538

PROJECT NAVIGATOR LTD®

PARCEL NO. 41, Hernandez Auto - Unit #8 SPECIFIC WORKPLAN



NOTE: Photograph is current

Parcel Information

Parcel No. APN 8167-002-041
Owner: Eugene & Geraldine Welter Trust
Tenants: Hernandez Auto
Area: 0.78 Ac. (Total for Parcel #41)

Construction Activities

1. Seal cracks in building foundation (office and workshop)
2. Remove existing asphalt and replace with engineered asphalt cover
3. Install 1 new Bio-Vent well, BW-12

Key WDIG Agreements

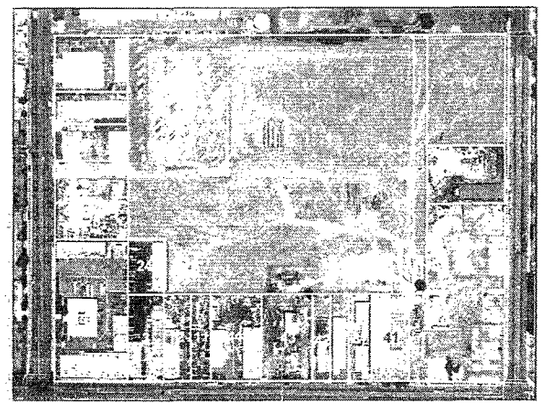
1. Perform work on weekend

Key Tenant/Owner Agreements

1. Clear property interior
2. Remove vehicles outside

Final Version: 2-24-04

	Task Name	Duration	Start	Finish
144	Parcel #41	15 days	Mon 3/22/04	Fri 4/9/04
145	Site Preparation (Tenants clear yard)	4 days	Mon 3/22/04	Thu 3/25/04
146	Remove and replace asphalt (First half over weekend)	2 days	Fri 3/26/04	Mon 3/29/04
147	Seal Interior Floor slabs (weekend work)	5 days	Tue 3/30/04	Mon 4/5/04
148	Remove and replace asphalt (Second half)	4 days	Tue 4/6/04	Fri 4/9/04
149	Side gutter (not on critical path)	2 days	Thu 4/1/04	Fri 4/2/04



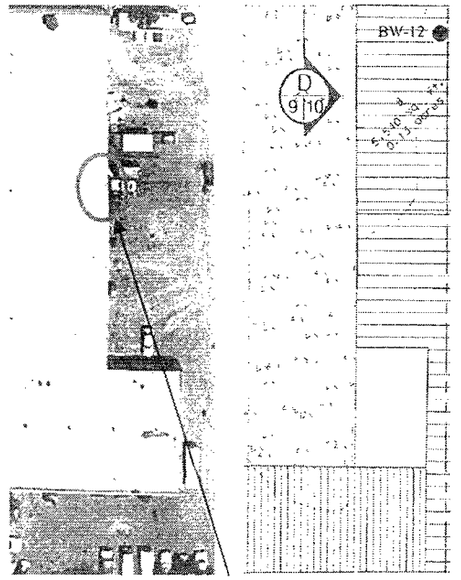
NOTE: Photograph from 1998.

Health and Safety

- Tenant agrees to keep personnel and equipment out of remedial construction area during performance of the work.
- Attached is a fact sheet containing information on the epoxy compound that will be used to seal and insulate the building foundation.

Access and Security

- Access:
  - Allow remedial contractors access to work area during scheduled work day
- Security:
  - Coordinate security procedures with tenant/owner prior to beginning work



Location of Hernandez Auto

NOTE: Photograph from 1998.

Legend

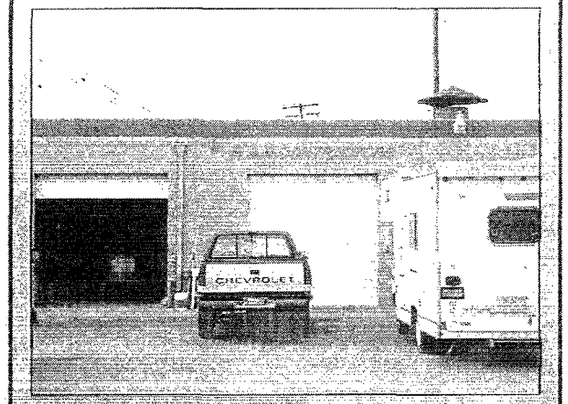
- RCRA SUBTITLE C-EQUIVALENT CAP AREA — DETAIL 4 (9|10)
- RCRA SUBTITLE D-EQUIVALENT COVER AREA — DETAIL 5 (9|10)
- REMOVE EXISTING ASPHALT AND REPLACE WITH ENGINEERED ASPHALT COVER — DETAIL 6 (9|10)
- 2" ASPHALT OVERLAY COVER — DETAIL 6A (9|10)
- REMOVE EXISTING CONCRETE AND REPLACE WITH ENGINEERED CONCRETE COVER — DETAIL 7 (9|10)
- ENGINEERED CONCRETE COVER WITH SEALED CRACKS — DETAIL 7A (9|10)
- SEAL ASPHALT AND RESTRIPE

Contact Information

1. EPA Community Relations Coordinator: Hector Aguirre, 415.972.3238
2. WDIG Project Manager: Roberto Puga, 714.449.8922
3. Hernandez Auto: Octavio Hernandez, 562.777.1197

PROJECT NAVIGATOR LTD.

PARCEL NO. 41, H & H Contractors - Unit #9 and #10 SPECIFIC WORKPLAN



NOTE: Photograph is current

Parcel Information

Parcel No. APN 8167-002-041

Owner: Eugene & Geraldine Welter Trust

Tenants: H & H Contractors

Area: 0.78 Ac. (Total for Parcel #41)

Construction Activities

1. Seal cracks in building foundation
2. Remove existing asphalt and replace with engineered asphalt cover
3. Install 1 new Bio-Vent well, BW-12

Key WDIG Agreements

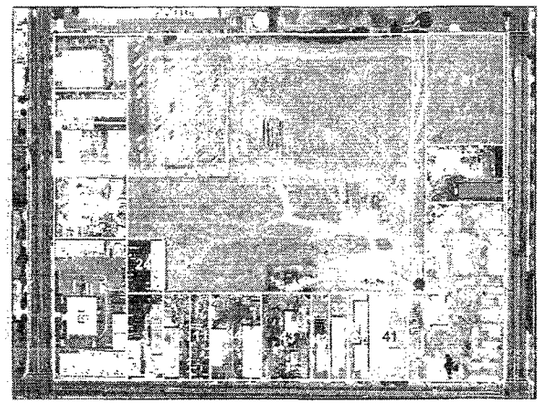
1. Split indoor work into two different days to allow tenant more time to prepare
2. Perform work on weekend

Key Tenant/Owner Agreements

1. Clear property
2. Remove vehicles outside

Final Version: 2-24-04

	Task Name	Duration	Start	Finish
144	Parcel #41	15 days	Mon 3/22/04	Fri 4/9/04
145	Site Preparation (Tenants clear yard)	4 days	Mon 3/22/04	Thu 3/25/04
146	Remove and replace asphalt (First half over weekend))	2 days	Fri 3/26/04	Mon 3/29/04
147	Seal Interior Floor slabs (weekend work)	5 days	Tue 3/30/04	Mon 4/5/04
148	Remove and replace asphalt (Second half)	4 days	Tue 4/6/04	Fri 4/9/04
149	Side gutter (not on critical path)	2 days	Thu 4/1/04	Fri 4/2/04



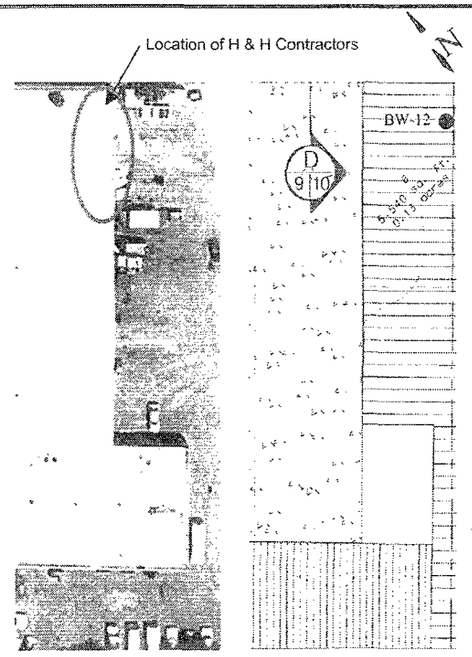
NOTE: Photograph from 1998.

Health and Safety

- Tenant agrees to keep personnel and equipment out of remedial construction area during performance of the work.
- Attached is a fact sheet containing information on the epoxy compound that will be used to seal and insulate the building foundation.

Access and Security

- Access:
  - Allow remedial contractors access to work area during scheduled work day
- Security:
  - Coordinate security procedures with tenant/owner prior to beginning work



NOTE: Photograph from 1998.

Legend

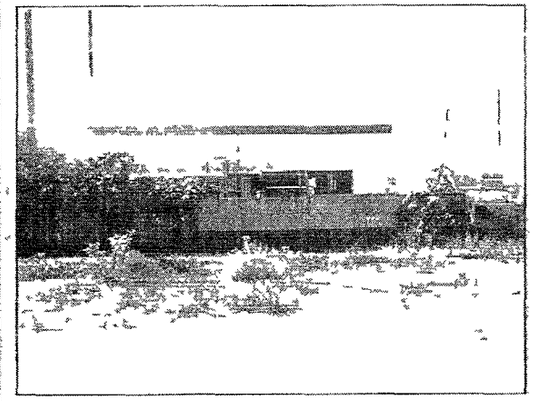
- RCRA SUBTITLE C-EQUIVALENT CAP AREA — DETAIL 4 (9 | 10)
- RCRA SUBTITLE D-EQUIVALENT COVER AREA — DETAIL 5 (9 | 10)
- REMOVE EXISTING ASPHALT AND REPLACE WITH ENGINEERED ASPHALT COVER — DETAIL 6 (9 | 10)
- 2" ASPHALT OVERLAY COVER — DETAIL 6A (9 | 10)
- REMOVE EXISTING CONCRETE AND REPLACE WITH ENGINEERED CONCRETE COVER — DETAIL 7 (9 | 10)
- ENGINEERED CONCRETE COVER WITH SEALED CRACKS — DETAIL 7A (9 | 10)
- SEAL ASPHALT AND RESTRIPE

Contact Information

1. EPA Community Relations Coordinator: Hector Aguirre, 415.972.3238
2. WDIG Project Manager: Roberto Puga, 714.449.8922
3. H & H Contractors: Roger Hall, 562.946.5108

PROJECT

PARCEL NO. 42 SPECIFIC WORKPLAN



NOTE Photograph is current

Parcel Information

Parcel No	APN 8167-002-042
Owner	Danny R Peoples & Dena Peoples
Tenants	Mike's Speed and Marine
Area	0 51 Ac

Construction Activities –

(All work is at Mike's Speed and Marine)

1 Attempt to improve drainage between buildings
2 Remove existing asphalt and replace with engineered asphalt cover
3 Install 1 new Bio-Vent well, BW-14

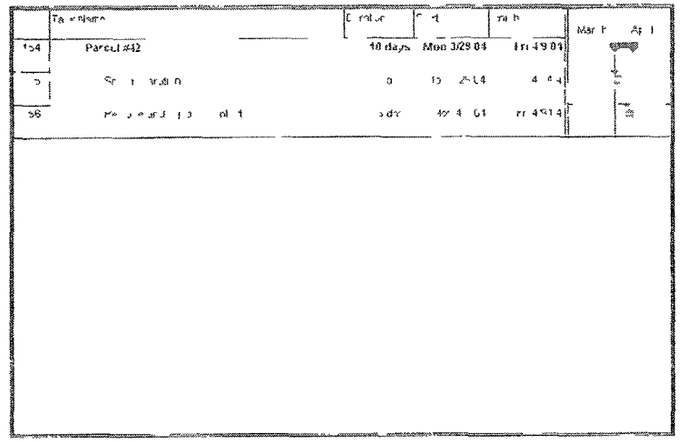
Key WDIG Agreements

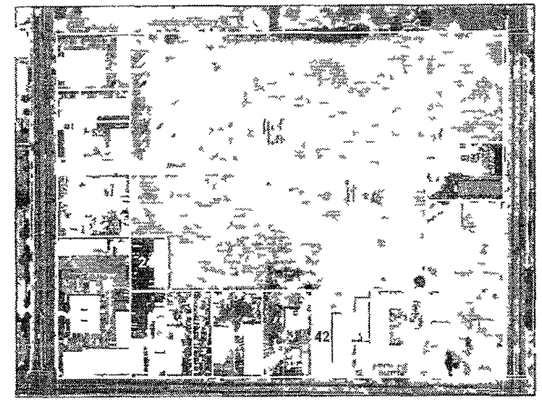
1 Move drums on pallet
2 Remove parking bumpers
3 Match the concrete grades near tank at back of the building
4 Remove the small chain link fence within property, do not replace
5 Move the compressor to seal around the base
6 Provide paving estimate for lot nearest street

Key Tenant/Owner Agreements

1 Tenants to move cars and dolly from rear of parcel when ready to pave

Final Version 2 24-04





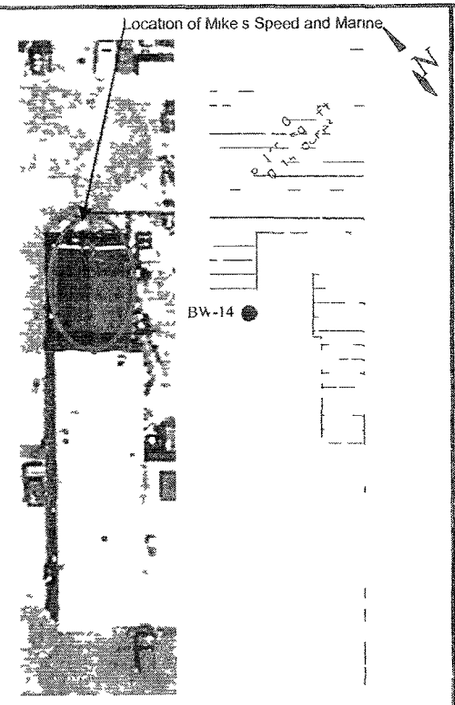
NOTE Photograph from 1998

Health and Safety

- Tenant agrees to keep personnel and equipment out of remedial construction area during performance of the work
- Low overhead power cables

Access and Security

- Access
  - Allow remedial contractors access to work area during scheduled work day
- Security
  - Coordinate security procedures with tenant/owner prior to beginning work



NOTE Photograph from 1998

Legend

RCRA SUBTITLE C EQUIVALENT CAP AREA
DETAIL 4 9 10

RCRA SUBTITLE D EQUIVALENT COVER AREA
DETAIL 5 9 10

REMOVE EXISTING ASPHALT AND REPLACE WITH ENGINEERED ASPHALT COVER
DETAIL 6 9 10

2 ASPHALT OVERLAY COVER
DETAIL 6A 9 10

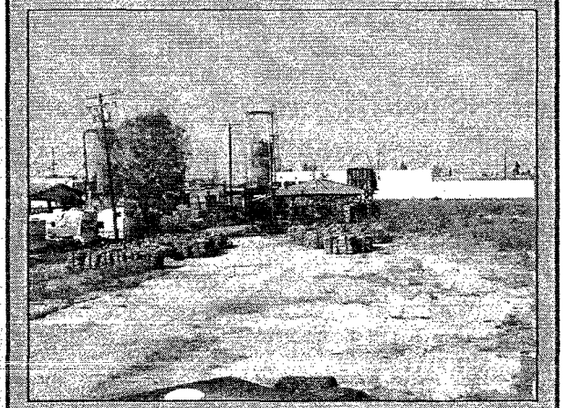
REMOVE EXISTING CONCRETE AND REPLACE WITH ENGINEERED CONCRETE COVER
DETAIL 7 9 10

ENGINEERED CONCRETE COVER WITH SEALED CRACKS
DETAIL 7A 9 10

SEAL ASPHALT AND RESTRIPE

Contact Information

PARCEL NO. 43, Timmon's Wood Products - SPECIFIC WORKPLAN



NOTE: Photograph is current.

Parcel Information

Parcel No. APN 8167-002-043
Owner: Eddie Earl Timmons
Tenants: Timmon's Wood Products
Area: 1.02 Ac.

Construction Activities

1. Seal cracks in building foundation
2. Seal the concrete slab in the back portion of the building
3. Install 2" asphalt overlay cover
4. Remove and replace asphalt in areas with subgrade failure

Key WDIG Agreements

1. Cut down palm tree, grind down stump and seat over
2. Attempt to improve drainage on far side of work (some areas with uneven surfaces)
3. Replace asphalt as necessary where subgrade is poor
4. Provide paving estimate for front of lot
5. Provide temporary storage area for inventory

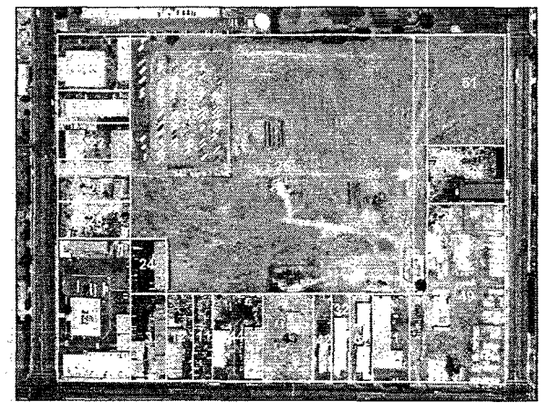
Key Tenant/Owner Agreements

1. Clear inventory

Final Version: 2-24-04

	Task Name	Duration	Start	Finish
179	Parcel #43	16 days	Fri 4/23/04	Fri 5/14/04
180	Site preparation	5 days	Fri 4/23/04	Thu 4/29/04
181	Remove and replace asphalt	4 days	Fri 4/30/04	Wed 5/5/04
182	Overlay asphalt	4 days	Thu 5/6/04	Tue 5/11/04
183	Seal interior floor slabs	3 days	Wed 5/12/04	Fri 5/14/04
184	Tree removal	1 day	Fri 4/23/04	Fri 4/23/04

March April May



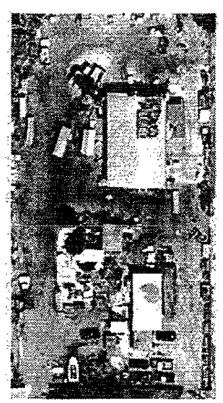
NOTE: Photograph from 1998.

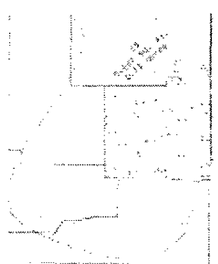
Health and Safety

- Tenant agrees to keep personnel and equipment out of remedial construction area during performance of the work.
- Attached is a fact sheet containing information on the epoxy compound that will be used to seal and insulate the building foundation.

Access and Security

- Access:
  - Allow remedial contractors access to work area during scheduled work day
- Security:
  - Coordinate security procedures with tenant/owner prior to beginning work





NOTE: Photograph from 1998.

Legend

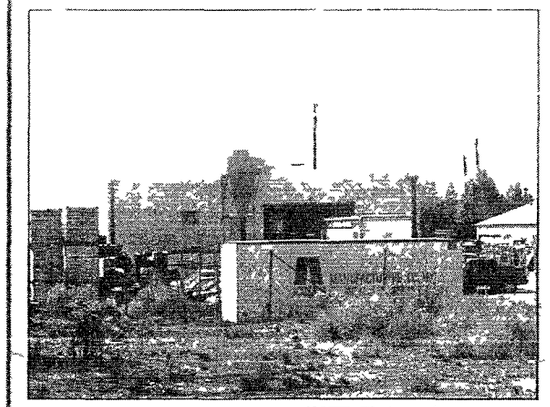
- RCRA SUBTITLE C-EQUIVALENT CAP AREA — DETAIL 4 / 9 10
- RCRA SUBTITLE D-EQUIVALENT COVER AREA — DETAIL 5 / 9 10
- REMOVE EXISTING ASPHALT AND REPLACE WITH ENGINEERED ASPHALT COVER — DETAIL 6 / 9 10
- 2" ASPHALT OVERLAY COVER — DETAIL 6A / 9 10
- REMOVE EXISTING CONCRETE AND REPLACE WITH ENGINEERED CONCRETE COVER — DETAIL 7 / 9 10
- ENGINEERED CONCRETE COVER WITH SEALED CRACKS — DETAIL 7A / 9 10
- SEAL ASPHALT AND RESTRIPE

Contact Information

1. EPA Community Relations Coordinator: Hector Aguirre, 415.972.3238
2. WDIG Project Manager: Roberto Puga, 714.388.1802
3. Timmon's Wood Products: Ed Timmons, 562.946.5401

PROJECT NAVIGATOR, LTD.

PARCEL NO. 44, Sisneros Office Furniture - SPECIFIC WORKPLAN



NOTE. Photograph is current.

Parcel Information

Parcel No	APN 8167-002-044
Owner	Chasin Trust, Hanson Trust Searle Revocable 1989 Trust
Tenants	Sisneros Office Furniture
Area	1 18 Ac

Construction Activities

1. Match elevation of asphalt to finish grade of existing concrete slabs
2. Fill cracks inside the building with epoxy
3. Remove existing asphalt and replace with engineered asphalt cover
4. Seal cracks on existing engineered concrete cover
5. Fill gaps between slabs

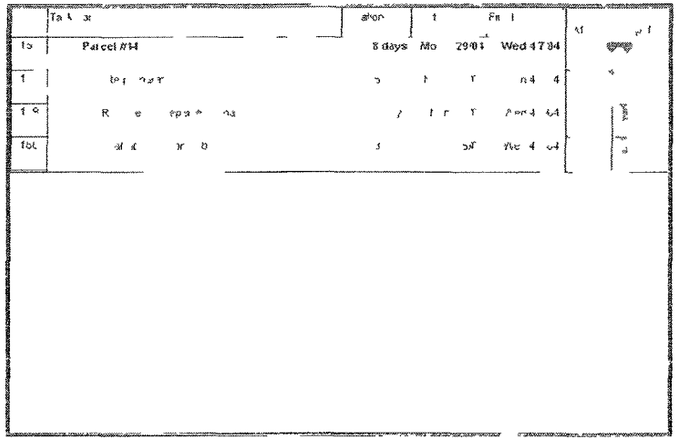
Key WDIG Agreements

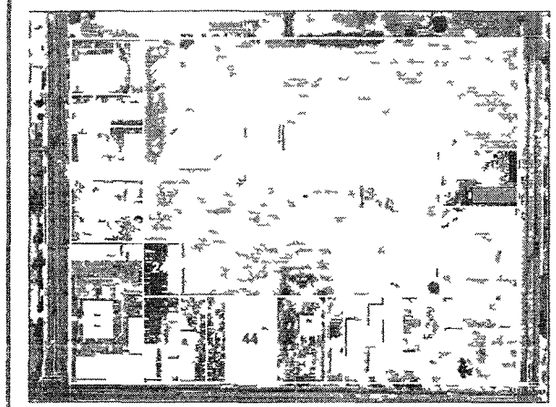
1. Provide a paving estimate for front of lot

Key Tenant/Owner Agreements

1. Owner to move cars from the back of building
2. Owner to move dog from back of building

Final Version 2 24 04





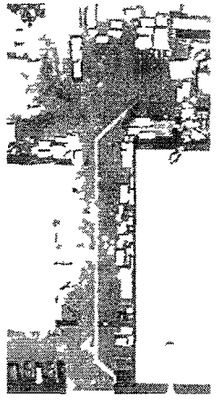
NOTE Photograph from 1998

Health and Safety

- Tenant agrees to keep personnel and equipment out of remedial construction area during performance of the work
- Attached is a fact sheet containing information on the epoxy compound that will be used to seal and insulate the building foundation

Access and Security

- Access
  - Allow remedial contractors access to work area during scheduled work day
- Security
  - Coordinate security procedures with tenant/owner prior to beginning work



NOTE Photograph from 1998

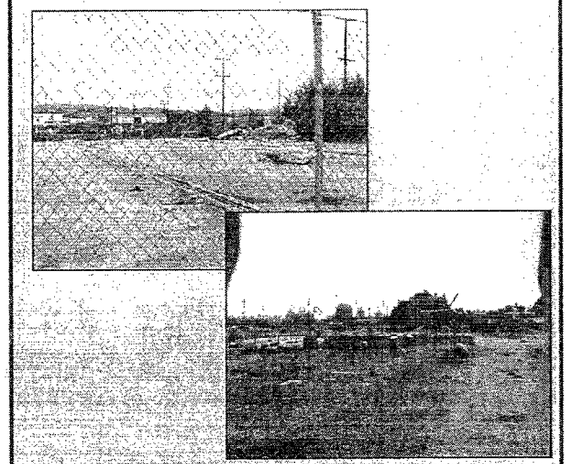
Legend

- RCRA SUBTITLE C EQUIVALENT CAP AREA — DETAIL 4 (9|10)
- RCRA SUBTITLED EQUIVALENT COVER AREA — DETAIL 5 (9|10)
- REMOVE EXISTING ASPHALT AND REPLACE WITH ENGINEERED ASPHALT COVER — DETAIL 6 (9|10)
- ASPHALT OVERLAY COVER — DETAIL 6A (9|10)
- REMOVE EXISTING CONCRETE AND REPLACE WITH ENGINEERED CONCRETE COVER — DETAIL 7 (9|10)
- ENGINEERED CONCRETE COVER WITH SEALED CRACKS — DETAIL 7A (9|10)
- SEAL ASPHALT AND RESTRIPE

Contact Information

PROJECT

PARCEL NO. 49 SPECIFIC WORKPLAN



NOTE: Photographs are current.

Parcel Information

Parcel No.: APN 8167-002-049
Owner: Phil Campbell & Diane Cote Family Trust/Gwen Campbell
Tenants: None
Area: 3.89 Ac.

Construction Activities

1. Concrete slab removal
2. Install RCRA Subtitle D-Equivalent cap
3. Drum handling and removal
4. Construct access road
5. Temporary location for construction office trailer
6. Temporary staging area (during construction)
7. Install 4 Bio-Vent wells Nos. BW-7, 8, 9, 10, 11

Key WDIG Agreements

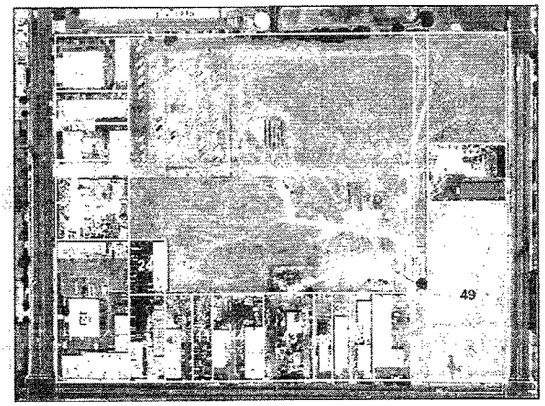
1. None necessary

Key Tenant/Owner Agreements

1. None

Final Version: 2-24-04

No interface with tenants.



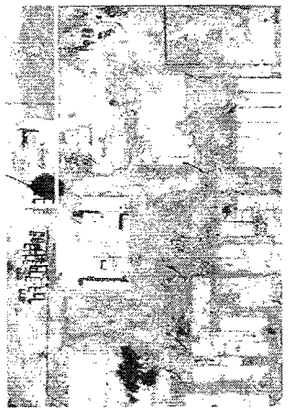
NOTE: Photograph from 1998.

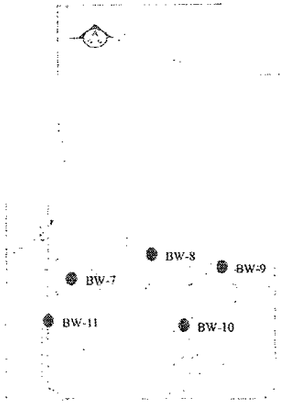
Health and Safety

- Owner agrees to keep personnel and equipment out of remedial construction area during performance of the work.

Access and Security

- Access:
  - Allow remedial contractors access to work area during scheduled work day
- Security:
  - Owner may elect to hire a security guard
  - Coordinate security procedures with tenant/owner prior to beginning work





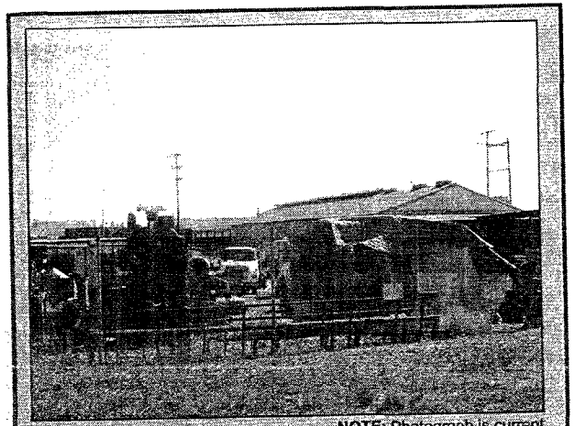
NOTE: Photograph from 1998.

Legend

- RCRA SUBTITLE C-EQUIVALENT CAP AREA — DETAIL 4 (9|10)
- RCRA SUBTITLE D-EQUIVALENT COVER AREA — DETAIL 5 (9|10)
- REMOVE EXISTING ASPHALT AND REPLACE WITH ENGINEERED ASPHALT COVER — DETAIL 6 (9|10)
- 2" ASPHALT OVERLAY COVER — DETAIL 6A (9|10)
- REMOVE EXISTING CONCRETE AND REPLACE WITH ENGINEERED CONCRETE COVER — DETAIL 7 (9|10)
- ENGINEERED CONCRETE COVER WITH SEALED CRACKS — DETAIL 7A (9|10)
- SEAL ASPHALT AND RESTRIPE

Contact Information

PARCEL NO. 50 SPECIFIC WORKPLAN



NOTE: Photograph is current.

Parcel Information

Parcel No. APN 8167-002-050
Owner: Brothers Machine & Tool, Inc.
Tenants: Brothers Machine & Tool
Area: 1.07 Ac.

Construction Activities

1. Building inspection
2. Building foundation sealing
3. Shallow waste excavation and removal
4. Remove existing asphalt; pave entire parcel
5. Install 4 Bio-Vent wells, BW-2, 3, 4, 5

Health and Safety

- Tenant agrees to keep personnel and equipment out of remedial construction area during performance of the work.
- Attached is a fact sheet containing information on the epoxy compound that will be used to seal and insulate the building foundation.

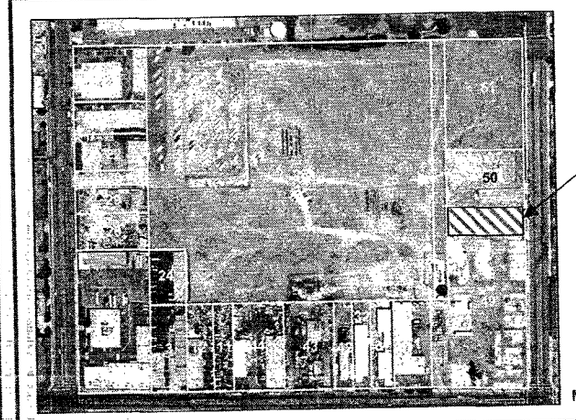
Access and Security

- Access:
  - Allow remedial contractors access to work area during scheduled work day
- Security:
  - Coordinate security procedures with tenant/owner prior to beginning work

Final Version: 2-24-04

	Task Name	Duration	Start	Finish
132	Parcel #50	27 days	Mon 3/22/04	Tue 4/27/04
133	Move Fence	2 days	Mon 3/22/04	Tue 3/23/04
134	Surface Preparation Work	2 days	Mon 3/22/04	Tue 3/23/04
135	Mobilize specific forklift for equipment	2 days	Wed 3/24/04	Thu 3/25/04
136	Brother's personnel to relocate yard equipment	3 days	Fri 3/26/04	Tue 3/30/04
137	Remove existing surface and prepare subgrade	5 days	Wed 3/31/04	Tue 4/6/04
138	Shallow waste removal	5 days	Wed 3/31/04	Tue 4/6/04
139	Install RCRA-D Cover	6 days	Wed 4/7/04	Wed 4/14/04
140	Replace asphalt/concrete	4 days	Thu 4/15/04	Tue 4/20/04
141	Seal interior floor slab	2 days	Wed 3/31/04	Thu 4/1/04
142	Brother's personnel to replace yard equipment	3 days	Wed 4/21/04	Fri 4/23/04
143	Replace fence	2 days	Mon 4/26/04	Tue 4/27/04

March April



NOTE: Photograph from 1998.

Key WDIG Agreements

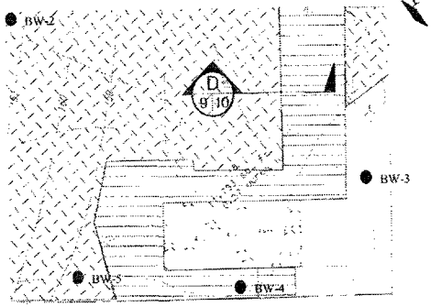
1. Construct gravel wearing surface on GCL cap area and grade area to be level
2. Locate and provide a forklift that can move 80,000 lbs equipment
3. Install a temporary fence to enclose the temporary storage area– this should be scheduled early so that the company can start moving their equipment prior to the forklift arriving and the movement of equipment.

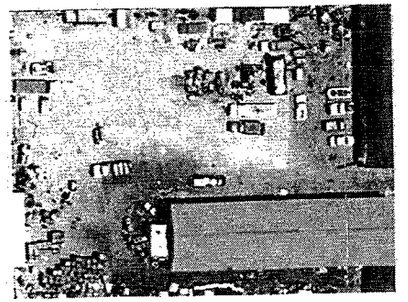
Key Tenant/Owner Agreements

1. Tenants to move outside equipment to temporary laydown yard prior to construction
2. Tenants to move equipment onsite upon completion of construction

Inventory of Equipment

(2) King Machine, 75,000 lbs., vertical turret lathe, Location: Under canopy
(1) King Machine, 40,000 lbs., vertical turret lathe, Location: Under canopy
(1) 28,000 lbs., vertical turret lathe, Location: South side of property
(1) 28,000 lbs., vertical turret lathe, Location: Rear of property
(1) 22,000 lbs., vertical turret lathe, Location: Rear of property
(1) 75,000 lbs., vertical turret lathe, Location: Rear of property
(1) 5,000 lbs., electrical Box, Location: Rear of property
(1) Vertical turret lathe (in 5 pieces, heaviest ~30,000 lbs), Location: Rear of property
(1) 25,000 lbs., vertical turret lathe, Location: Rear of property
(1) 15,000 lbs., horizontal turret lathe, Location: Rear of property
(1) 20,000 lbs., computer numerical control lathe, Location: Right side of property
(1) 30,000 lbs., inspection table, Location: Right side of property
(1) Vertical turret lathe (in 10 pieces, heaviest ~80,000 lbs), Location: Right side of property
(1) 160,000 lbs. total, horizontal turret lathe, Location: Right side of property
(1) 35,000 lbs., Milling machine, Location: Right side of property
(1) 25,000 lbs. total, Grinder (15,000lbs.) & horizontal turret lathe (10,000lbs.), Location: Right side of property





NOTE: Photograph from 1998.

Legend

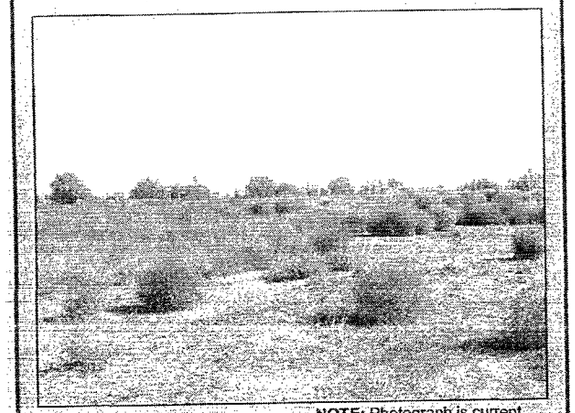
- RCRA SUBTITLE C-EQUIVALENT CAP AREA — DETAIL 4 (9 | 10)
- RCRA SUBTITLE D-EQUIVALENT COVER AREA — DETAIL 5 (9 | 10)
- REMOVE EXISTING ASPHALT AND REPLACE WITH ENGINEERED ASPHALT COVER — DETAIL 6 (9 | 10)
- 2" ASPHALT OVERLAY COVER — DETAIL 6A (9 | 10)
- REMOVE EXISTING CONCRETE AND REPLACE WITH ENGINEERED CONCRETE COVER — DETAIL 7 (9 | 10)
- ENGINEERED CONCRETE COVER WITH SEALED CRACKS — DETAIL 7A (9 | 10)
- SEAL ASPHALT AND RESTRIPE

Contact Information

1. [illegible] 415.972.3228 2. WDIG Project Manager: Roberto Puga, 714.388.1802 3. Brothers Machine & Tool: Jose Razo, 562.903.1117

PROJECT NAVIGATOR, LTD.

PARCEL NO. 51 SPECIFIC WORKPLAN



NOTE: Photograph is current.

Parcel Information

Parcel No.: APN 8167-002-051
Owner: Pitts Grandchildren's Trust
Tenants: Unknown
Area: 2.15 Ac.

Construction Activities

1. Install RCRA Subtitle D-Equivalent cap
2. Install landscaping screen and irrigation as necessary
3. Install foul-ball fence
4. Install storm drain piping

Key WDIG Agreements

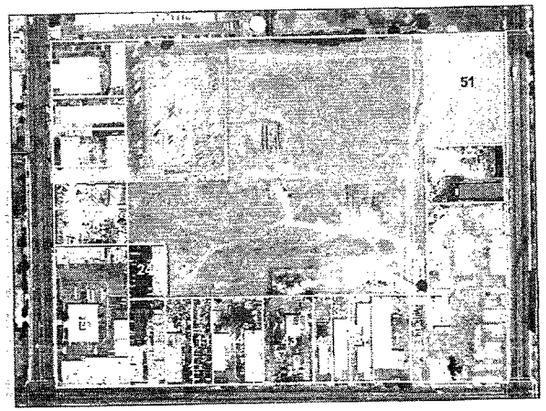
1. None necessary

Key Tenant/Owner Agreements

1. None necessary

Final Version: 2-24-04

No interface with tenants.



NOTE: Photograph from 1998.

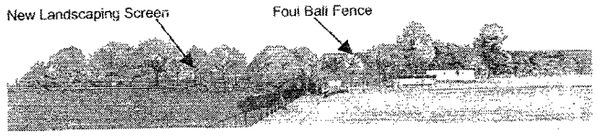
Health and Safety

- Tenant agrees to keep personnel and equipment out of remedial construction area during performance of the work.

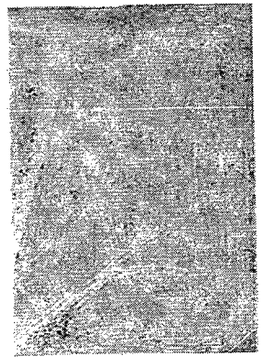
Access and Security

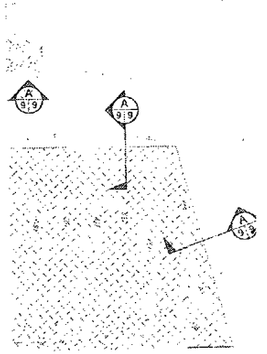
- Access:
  - Allow remedial contractors access to work area during scheduled work day
- Security:
  - Coordinate security procedures with tenant/owner prior to beginning work

WDI Site after remedy construction



Note: It will take some time, e.g. two years for the landscape to mature.





NOTE: Photograph from 1998.

Legend

- RCRA SUBTITLE C-EQUIVALENT CAP AREA — DETAIL 4 (9|10)
- RCRA SUBTITLE D-EQUIVALENT COVER AREA — DETAIL 5 (9|10)
- REMOVE EXISTING ASPHALT AND REPLACE WITH ENGINEERED ASPHALT COVER — DETAIL 6 (9|10)
- 2" ASPHALT OVERLAY COVER — DETAIL 6A (9|10)
- REMOVE EXISTING CONCRETE AND REPLACE WITH ENGINEERED CONCRETE COVER — DETAIL 7 (9|10)
- ENGINEERED CONCRETE COVER WITH SEALED CRACKS — DETAIL 7A (9|10)
- SEAL ASPHALT AND RESTRIPE

Contact Information

PROJECT

APPENDIX B.4
SITE ACCESS AND SECURITY PLAN

B.4.1 INTRODUCTION

1. The Site Access and Security Plan (Plan) is submitted as Appendix B.4 of the Remedial Action Workplan (RAWP). This Plan is specified under Section 5.11 of the Statement of Work (SOW) for the Consent Decree.

2. The purpose of this Plan is to limit and control Site access during the implementation of RAWP and other SOW activities, inclusive of activities performed by EPA, other regulatory agencies and their Contractors. This Plan will be implemented by Site access control and Site security measures. These measures are discussed in the following sections.

B.4.2 SITE ACCESS

1. The Waste Disposal, Inc. Superfund Site is located in the City of Santa Fe Springs, Los Angeles County, California on an approximate 40-acre parcel of land (Figure B.4.1). The Site is bordered on the northwest by Santa Fe Springs Road, on the northeast by a Distribution Center and St. Paul High School, on the southwest by Los Nietos Road, and on the southeast by Greenleaf Avenue. Areas of the Site along Los Nietos Road and Santa Fe Springs Road are occupied by industrial complexes, while the Site property along Greenleaf Avenue, which is the closest property boundary to residential areas (approximately 50 feet), has one remaining structure (Area 5) and a few remaining foundations from previous structures (Areas 6 and 7).

2. Currently the portions of the Site without operating businesses are enclosed by a chain-link fence with chain-locked gates at different locations. There are currently four access gates at the locations shown in Figure B.4.1. At intervals around the perimeter of the Site are warning signs. Figure B.4.2 shows the security fence and access gates and roads during/after construction, along with the proposed locations of signs. Figure B.4.3 shows the sign in English and Figure B.4.4 shows the sign in Spanish. An inspection will be performed by the Contractor at the beginning and end of Remedial Action construction to verify the fences and gates are intact, signs are in place, and replace any missing signs.

3. Access will be controlled by having only one gate routinely open during operation hours. This gate will be near site office trailer(s) and other onsite facilities so that it can be watched by site

personnel. Other gates may be opened periodically to facilitate specific work activities, and personnel involved with the specific activity will watch for unauthorized entrance.

4. The gates will be locked during nonentrance operating hours (open hours are expected to be 7 a.m. to 6 p.m.). Keys to the locks will be controlled by the Field Superintendent for the Supervising Contractor. In addition, the Supervising Contractor has construction equipment onsite that will be secured and locked during nonoperation hours. Standard security procedures will be followed to protect construction equipment.

5. In the areas of the operating businesses, access is controlled by the tenant or owner. Measures used include locking gates, fences and guard dogs. During construction in these areas, access to areas where work is being performed will be controlled using the procedures in the Health and Safety Program, primarily to mitigate physical hazards. In addition, security during construction in these areas will be coordinated with the tenants and owners as part of planning. Measures to be implemented include keeping gates locked during nonoperational hours, temporary fencing when a fence must be removed, keeping all doors and facilities locked if work is performed after business hours and use of a guard or security service as necessary.

B.4 SITE SECURITY

B.4.3.1 RESPONSIBILITIES

1. During remedial action construction, the Supervising Contractor will be responsible for providing Site Security. The duties will include maintaining fences, providing access control, assuring the gates are closed and locked during nonworking hours, managing a sign-in and sign-out log of authorized Site visitors, communication, coordination, and integration with other entities (in particular the onsite businesses and emergency services) regarding security, emergencies, and security during storm events.

2. During the operation and maintenance period, Site Security will be the responsibility of the selected operation and maintenance Contractor. The duties will be the same as during the construction activities, but also include periodic inspection for vandalism and trespass.

B.4.3.2 SECURITY SERVICES

1. If necessary, the Supervising Contractor may contract with a security service to provide additional security during nonworking hours. This may include periodic drive-by surveillance or a guard. If a guard is used, the guard shall be appropriately trained, including 40-hour occupational Safety and Health Administration (OSHA) training per 29 CFR Part 1910.120.

2. If theft or vandalism occurs, or if required due to unauthorized access or trespass, the police would be contacted and a report would be filed. The phone number for the police is presented in Table B.4.1. The WDIG Project Coordinator and EPA would also be notified in the event of theft, vandalism or trespass.

B.4.3.3 SECURITY DURING STORM EVENTS

1. A security issue during storm events is flooding and stormwater control. Regrading was performed at the Site in 1997, which mitigates threats from flooding. The final grades are similar to earlier grading and designed to prevent flooding. However, during construction, coordination with emergency services and local businesses will be performed to assure that access can be provided for emergencies to further mitigate threats of damage from floods. Coordination would principally include exchange of contact information and posting of phone numbers at the main gate to facilitate rapid communication. Similar measures would be implemented during the operation and maintenance period.

2. In addition, during construction, stormwater controls are included as part of design. These controls will prevent erosion and runoff that could clog stormdrains or cause damage to neighboring businesses. Stormwater controls are further discussed in Appendix B.6 (The Stormwater Pollution Prevention Plan).

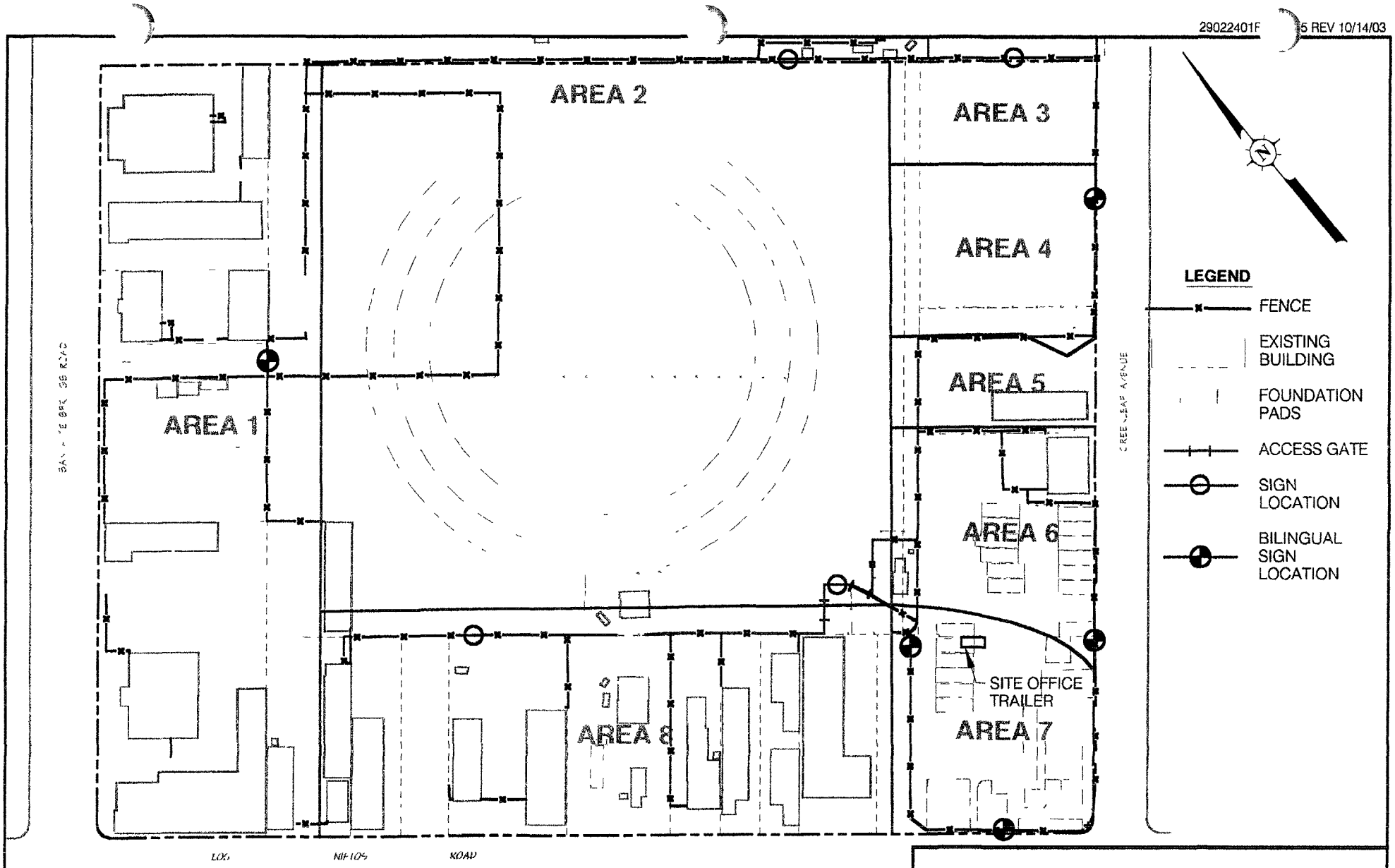
TABLE B.4.1

EMERGENCY PHONE NUMBERS
WASTE DISPOSAL, INC. SUPERFUND SITE

Fire Department	911 or (562) 868-1711
Police/Sheriff	911 or (562) 409-1850
Paramedics	911 or (562) 868-1711
Hospital: Presbyterian Intercommunity Hospital 1201 East Washington Boulevard, Whittier	(562) 698-0811
EPA RPM: Russell Mechem	(415) 972-3192
EPA Community Involvement Coordinator: Hector Aguirre	(415) 972-3238
USACE Field Representative: Richard Lane	(625) 401-4047
WDIG Project Coordinator: Roberto Puga, Project Navigator, Ltd.	(714) 449-8920
Recon Construction Superintendent: Andy Tillery	(909) 549-6262
TRC Project Manager: Thomas Patterson	(949) 727-9336

29022401 Final RAWP

29022401F 5 REV 10/14/03



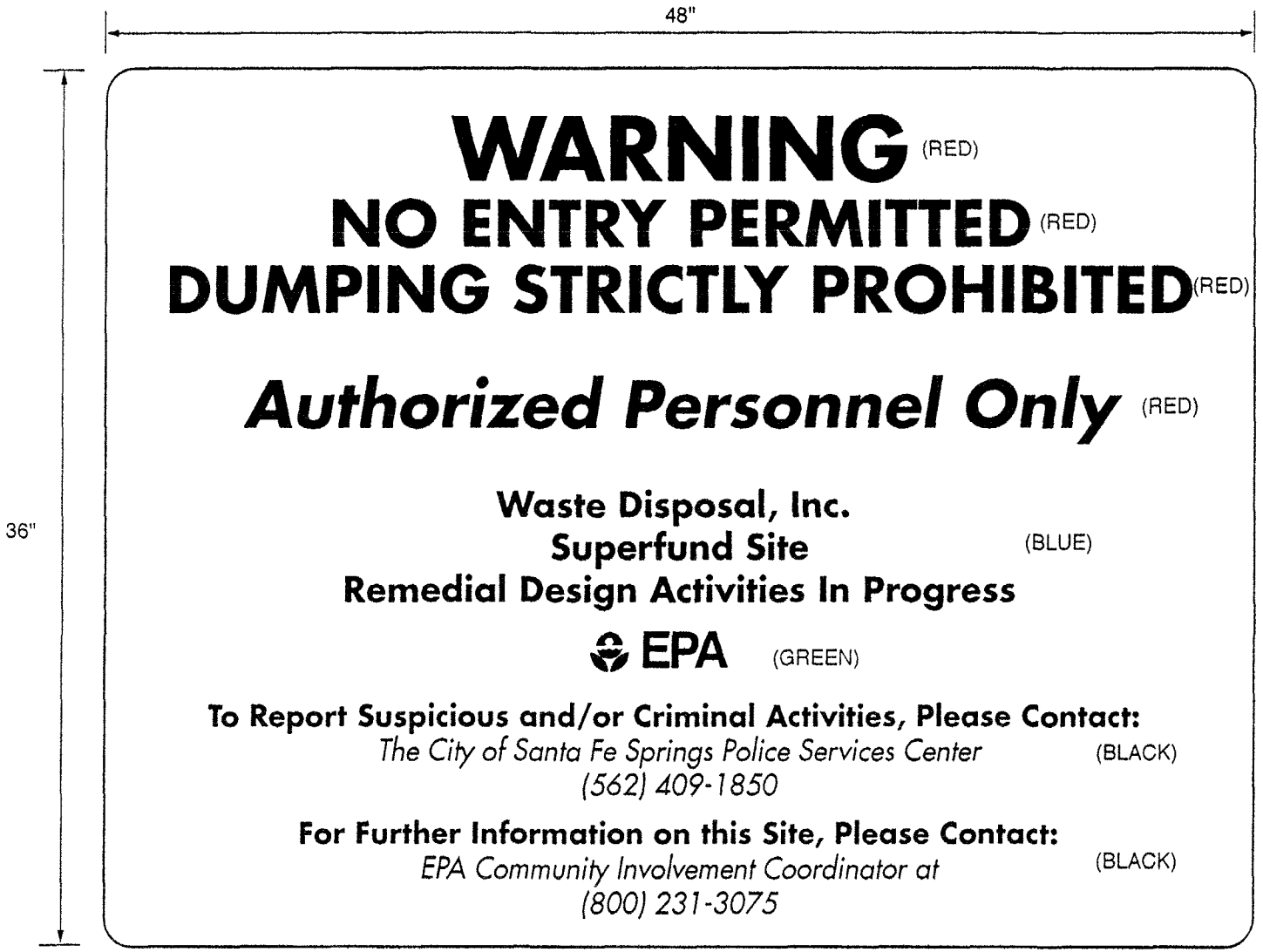
REFERENCE. NUÑEZ ENGINEERING.

EXISTING SECURITY FENCE AND ACCESS GATE LOCATIONS

WASTE DISPOSAL, INC.
SANTA FE SPRINGS, CALIFORNIA

TRC

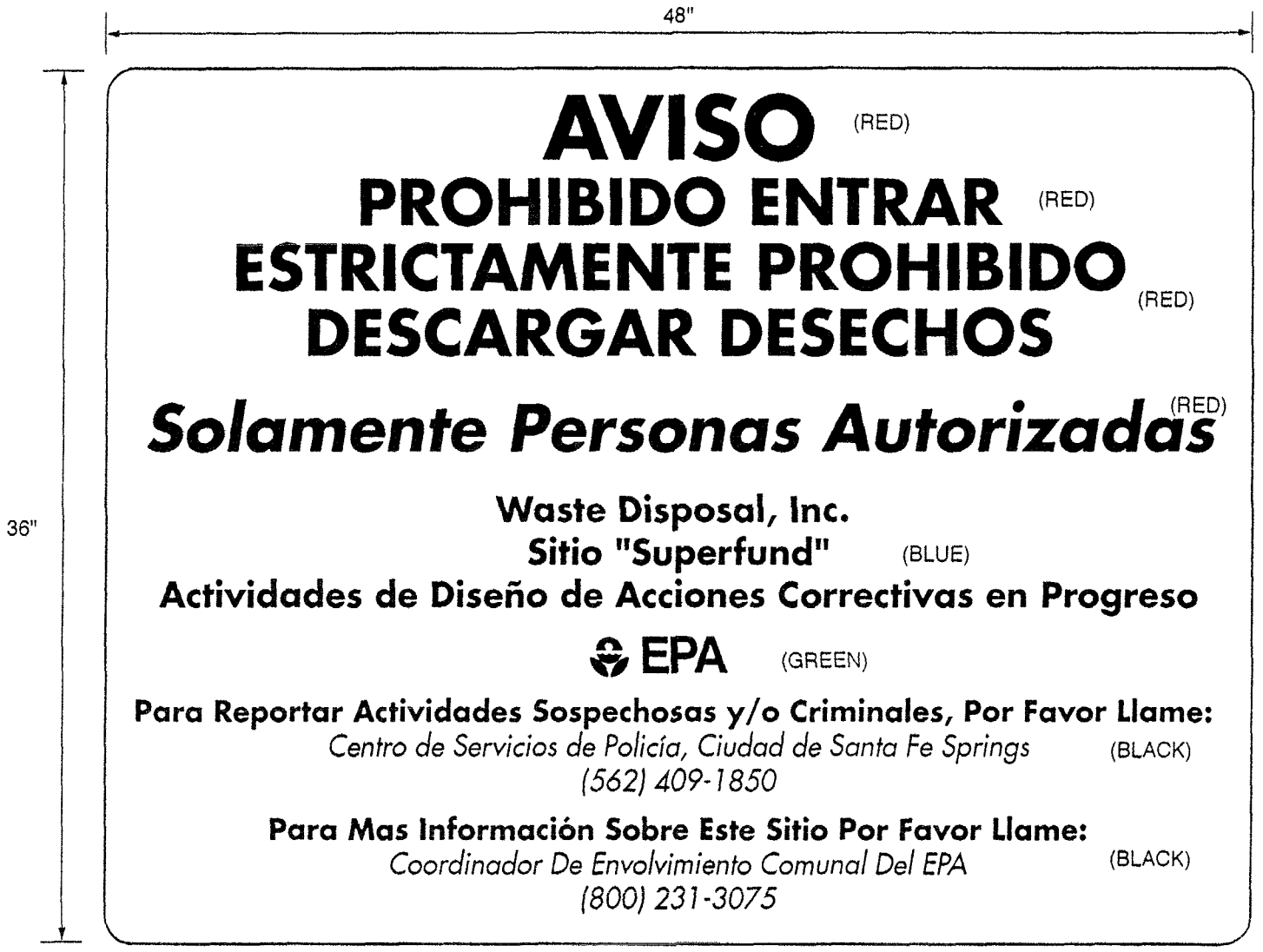
FIGURE B.4.1



SITE SIGN

WASTE DISPOSAL, INC.
SUPERFUND SITE

TRC | FIGURE B.4.2



SITE SIGN (SPANISH)

WASTE DISPOSAL, INC.
SUPERFUND SITE

TRC | FIGURE B.4.3

APPENDIX B.5
WASTE MATERIALS DISPOSAL PLAN

B.5.1 INTRODUCTION

1. This Waste Materials Disposal Plan (Plan) is submitted as Appendix B.5 of the Remedial Action Workplan (RAWP) for the soils and subsurface gas operable unit for the Waste Disposal, Inc. (WDI) Site. This Plan is specified under Section 5.1.2 of the Statement of Work (SOW) for the Consent Decree.

2. The purpose of the Plan is to present the alternatives for removing offsite, or managing and disposing onsite, the waste materials left on the Site or generated during construction. The remainder of this plan discusses the various alternatives for disposal for each of the waste types located on the Site and procedures for selecting an offsite disposal facility.

B.5.2 WASTE MATERIALS DISPOSAL PLAN

1. There are hundreds of steel drums at the Site, containing waste material from various U.S. Environmental Protection Agency (EPA) and WDI Group (WDIG) investigative activities. These drums are in varying conditions, ranging from completely rusted through to in very good condition. Not all drums have legible labels. Additionally, there are various types of noninvestigative activity-related debris ranging from an abandoned bus to piles of hose and wooden pallets. Also, during construction, wastes may be generated that require management. These waste could include construction debris and rubble, excavated waste material, or free liquids.

2. Figure 4.1 of the RAWP shows a schedule of activities to be completed during construction. The first activity to be performed under this Plan is to complete a survey of the drums and other debris and consolidate the drums into central locations. This survey will include the following activities:
   - Determining, in general, the contents of the drums (i.e., solids, liquids, personal protection equipment [PPE]).
   - Obtaining an accurate drum count by content type and an estimate of the volume of waste materials.
   - Identifying and quantifying the noninvestigative activity debris.

   The results of the survey and consolidation will be used to scope the disposal activities for each waste type. The disposal alternatives for each waste type are discussed in the following subsections.

B.5.2.1 DRUMMED SOILS

1. One prevalent waste material contained in drums is soils from investigations, in the form of drill cuttings from past investigations. The drums contain soils from all over the Site, including the reservoir.

2. These soils will be consolidated under the RCRA-equivalent C cap (RCRA-C cap) during construction. The actual protocols for moving the drums will be developed by the Contractor using the guidelines presented herein. This soil will be incorporated into the subgrade for the proposed RCRA-equivalent C-cap at the Site during Remedial Action activities either by digging trenches in the reservoir cover soils and reconsolidating prior to excavation for the RCRA-C cap or by stockpiling the soils in a selected area (protected from runon and away from the Site boundary) on top of a 40-mil HDPE liner, with runoff/erosion controls. Table 4.1 shows that the proposed time frame for this activity be during the start of Remedial Action activities at the Site. Under no circumstances will the drill cuttings be stockpiled for more than 2 months.

3. Drums that appear structurally sound (not rusted through or bent out of shape) will be handled pursuant to the procedure in Section B.5.2.9. Those drums that have deteriorated to an unsound condition will be moved in a backhoe or loader bucket, emptied at the stockpile, and crushed, and managed with the drummed soil, as described in Section B.5.2.1 above.

B.5.2.2 PURGED GROUND WATER AND DECONTAMINATION WATER

1. The other main type of waste material contained in drums is purged ground water and decontamination water. Some of the older drums that formerly contained this type of liquid may have leaked their contents due to corrosion of the drums.

2. This water is proposed to be consolidated into a portable tank, and used for dust control during cap construction. The water will only be used over the reservoir. Post analyses of purged ground water have indicated that levels of site-related constituents, if detected, are low, and would not affect the composition of liquids in the reservoir (which are contained, and would be eventually collected by the LCPs).

B.5.2.3 UNCHARACTERIZED DRUMMED WASTE

1. Approximately 75 steel drums (both 55- and 20-gallon) and plastic containers are currently on concrete foundation pads in Area 6 of the Site (i.e., "the Campbell Property"). These wastes are to be handled using the following phased approach:
   - Roll-off bins will be brought to Area 6. The drummed/containerized waste will be placed in the roll-off bins by waste type as follows:
     - Drummed petroleum products.
     - Drummed solidified products.
     - Drained solvent or paint products.
     - Each waste type will be sampled for waste disposal profiling. The samples will be sent to an appropriate waste disposal facility.
     - Handling of each container will be determined on a container-by-container basis. Those drums that are structurally unsound (cracked, bent out of shape, rusted through) will be overpacked before placing in the roll-on area.
     - Once profiling is completed and the waste accepted by a disposal facility, the drums will be disposed of.

2. Selection of a disposal facility is described in Section B.5.2.7.

B.5.2.4 CONSTRUCTION DEBRIS AND RUBBLE

1. Construction debris and rubble is sorted material from the excavated soil that will be used in the cover soil layer. Types of materials expected include broken concrete, metal debris, and possible trash. If feasible, these materials would be will be crushed, specifically the concrete, then incorporated in the cap cover material.

2. Unused materials will be staged in a selected area possible in roll-off bins and then hauled offsite to an appropriate landfill as part of demobilization.

B.5.2.5 EXCAVATED WASTE MATERIAL

1. It is possible that Waste Material (as defined in the Consent Decree) would be encountered during construction of the caps and would require excavation and management. As provided for in the approved Remedial Design, Waste Materials will be reconsolidated under the RCRA C-cap. The procedures for identifying Waste Materials during excavation for the caps is provided in the Design Specifications.

2. Any Waste Materials encountered during excavation will be managed similar to as described above for drummed soils. Specifically, the Waste Materials would be stockpiled in a selected area on top of a 40 mil HDPE geomembrane with containment to prevent runoff or release of material. The stockpile would be covered as necessary to protect it from precipitation, or to mitigate nuisances such as dust or odors.

3. Following excavation for the RCRA C-cap, the stockpiled Waste Materials would be placed in the designated area for reconsolidation of wastes (indicated in the Design Drawings). If necessary, the "contingency foundation" layer of the cover would be constructed over the reconsolidated waste to assure an appropriate foundation for the cap.

B.5.2.6 FREE LIQUIDS

1. There is a remote possibility that free liquids will be encountered during excavation for construction of the caps. The location where free liquids are encountered would be noted in the daily project activities report and discussed with the EPA or their designee upon discovery.

2. Free liquids will be collected in an appropriate container or stabilized using soil or other granular material before disposal. Containerized liquids would be managed in the same manner as the drummed waste from the Campbell Property described in Section B.5.2.3 above. If stabilized, it will be verified that the material passes the paint filter test, and the stabilized material will be placed in the stockpile for reconsolidation under the RCRA C-cap. Alternatively, if required by the EPA or their designee, the material would be disposed of at an appropriate offsite disposal facility.

B.5.2.7 SELECTION OF AN OFFSITE DISPOSAL FACILITY

1. Construction debris and rubble that is produced during construction (see Section B.5.2.4 above) will be disposed of at an appropriate offsite landfill. It is anticipated that these materials will not be contaminated with site-related constituents, as they will be sorted from the fill material which has previously been characterized as not requiring special management (i.e., the fill can be used as the top layer of the cover).

2. Waste Materials (as defined in the CD) taken offsite for disposal will be managed in compliance with 40 CFR § 300.440. This requirement applies in particular to the drummed wastes at the Campbell Property, free liquids, and Waste Materials that cannot be reconsolidated under the RCRA C cap.

3. Prior to any offsite shipment to an out-of-state waste management facility, written notification will be submitted to the appropriate State Environmental Official in the receiving facility's State and to the EPA Project Coordinator of such shipment of Waste Material. However, this notification requirement does apply to any offsite shipments when the total volume of all such shipments during any three month period will not exceed 15 cubic yards.

4. The written notification the following information, where available: (1) the name and location of the facility to which the Waste Material is to be shipped; (2) the type and quantity of the Waste Material to be shipped; (3) the expected schedule for the shipment of the Waste Material; and (4) the method of transportation. The State in which the planned receiving facility is located will be notified of major changes in the shipment plan, such as a decision to ship the Waste Material to another facility within the same State, or to a facility in another State.

5. The identity of the receiving facility and state will be determined by the Supervising Contractor during pre-construction activities, and written notification will be provided to the EPA. EPA will be notified before the Waste Material is actually shipped.

6. Following construction, the notification to officials in other States required above will be updated annually. In addition, the notification of the EPA regarding selection of an offsite disposal facility will be updated whenever (1) WDIG changes the identity of the receiving facility, or (2) if any offsite shipment of Waste Material differs significantly, in quantity or composition, from that described in the most recent notification.

7. Before shipping any hazardous substances, pollutants, or contaminants from the Site to an offsite location, WDIG shall obtain EPA's confirmation that the proposed receiving facility is operating in compliance with the requirements of CERCLA Section 121(d)(3) and 40 CFR 300.440. WDIG shall only send hazardous substances, pollutants, or contaminants from the Site to an offsite facility that complies with the requirements of CERCLA Section 121(d)(3) and 40 CFR 300.440 and shall ensure that the hazardous substances, pollutants, or contaminants sent from the Site to such facility will not be transferred from that facility to a

facility that has not received EPA's certification that it is operating in compliance with the requirements of CERCLA Section 121(d)(3) and 40 CFR 300.440.

B.5.2.8 PERSONAL PROTECTION EQUIPMENT

1. There is a potential for some of the drums to contain PPE from previous investigations. In addition, PPE may be generated during construction.

2. It is proposed that this PPE material be consolidated into a "Super Sack" and disposed of at an offsite facility. A roll-off bin will be placed onsite where the PPE can be stored prior to disposal. The procedures for selecting an offsite disposal facility described above in Section B.5.2.7 will be used for PPE disposal.

B.5.2.9 STEEL DRUMS

1. Once the waste materials in the drums are consolidated, the empty drums will be decontaminated using steam cleaners in a designated site decontamination area. The rinsate will be collected and placed within the liquid waste portable tank (see Section B.5.2.2). Exceptions to this procedure are those drums that are found to be structurally unsound. Structurally unsound drums will be handled pursuant to the procedures described in Sections B.5.2.1 and B.5.2.3.

APPENDIX B.6
STORMWATER POLLUTION PREVENTION PLAN

B.6.1 INTRODUCTION

1. This Stormwater Pollution Prevention Plan (SWPPP) is submitted as Appendix B.6 of the Remedial Action Workplan (RAWP) for implementation at the Waste Disposal, Inc. Site (Site) in Santa Fe Springs, California. This SWPPP has been designed around the site specific conditions at the Site.

2. To facilitate agency review, this SWPPP is arranged in the topical order suggested for the SWPPP in Code of Federal Regulations (CFR), Title 40.

B.6.2 CURRENT MANAGEMENT PRACTICES

B.6.2.1 OBJECTIVES

1. The SWPPP has two major objectives. The first is to identify existing and potential sources of pollution which may affect the quality of stormwater discharges associated with the Site. The second is to propose and implement the necessary practices that will reduce the introduction of the potential pollutants into stormwater discharges associated with specific areas of the Site.

2. This SWPPP is designed to cover only vacant (undeveloped) areas of the Site (Areas 2, 3, 4 and 7) herein, identified as Subject Areas. The remaining areas (Areas 1, 5, 6 and 8) have existing or abandoned light industrial businesses which are responsible for their own stormwater management practices. Figure 1 shows the Site boundary areas covered under this SWPPP and stormwater monitoring points. The existing Best Management Practices (BMPs) employed to reduce pollutant runoff at the Site are detailed in the following subsections.

B.6.2.2 SIGNIFICANT MATERIALS TREATED, STORED, DISPOSED, SPILLED OR LEAKED

1. Since the Site was closed as a waste disposal facility in the mid to late 1960s, no known materials have been treated, stored, disposed, spilled, or leaked in significant quantities in the Subject Area.

B.6.2.3 FACILITY, MATERIALS, AND EQUIPMENT MANAGEMENT

1. The Site encompasses approximately 40 acres of land. The portion of the Site covered under this SWPPP is comprised of approximately 20 acres of land. Previous Site documents provide a comprehensive site operational and regulatory history[1].

2. The Site is bordered to the south by Los Nietos Road. To the east, the Site is bordered by Greenleaf Avenue. To the north, it is bordered by Saint Paul High School and a Distribution Center. To the west, the Site is bordered by Santa Fe Springs Road.

3. The Subject Area currently does not receive any waste and have no industrial or construction activities being performed. Therefore, equipment or materials are not being stored at the Site.

4. Surface conditions in the Subject Area are undeveloped (vacant), covered with natural vegetation and/or concrete foundation pads. Area 2 consists of a dirt road, vacant areas, two 6,000-gallon Baker Tank and 55-gallon steel drums containing soil cuttings at two locations. The stored 55-gallon steel drums are from previous Site Investigative Activities. Two 6,000-gallon Baker Tanks contain purged ground water and decontamination water from previous site investigations and activities. Areas 3 and 4 are vacant (vegetative covered). Area 7 has several concrete foundation pads from previous tenants, limited vegetative covered areas and a temporary office trailer.

5. The lead enforcement agency at the Site is EPA.

B.6.2.4 MATERIALS HANDLING

1. There is no material handling or any other routine or permanent activities at the Subject Area of the Site.

B.6.2.5 STRUCTURAL AND NONSTRUCTURAL CONTROL MEASURES

1. A total of five stormwater monitoring points have been designated in the Subject Area to monitor surface water conditions at the Site. These monitoring points are shown in Figure 1. Surface water runoff is conveyed through the Subject Area by sheet flow and concentrated surface flow areas.

---

[1] EPA, Remedial Investigation Report, Waste Disposal, Inc. Site, Santa Fe Springs, California, 1989.

B.6.2.6 NONSTRUCTURAL CONTROLS

1. Several signs at designated areas identify the Site as a Superfund and that no waste is to be dumped at the Site.

B.6.3 INDUSTRIAL STORMWATER DISCHARGE TREATMENT FACILITIES

1. There are no industrial stormwater discharge treatment facilities required or existing at the Site.

B.6.4 MATERIAL STORAGE, HANDLING, AND DISPOSAL PRACTICES

1. The Subject Area does not have any material handling or disposal practices occurring. The materials stored at the Site have been identified in Section 2.3 of this SWPPP. These materials will be properly disposed during the Remedial Action activities for the Site.

B.6.5 POTENTIAL POLLUTANTS

1. There are no known sources of potential surface pollutants to stormwater runoff from the Subject Area. The stored material at the Site is not considered a potential pollutant source for the following reasons:
   - Liquids collected at the Site are stored in 6,000-gallon sealed Baker Tanks.
   - Older 55-gallon steel drums generated from EPA's Remedial Investigation/Feasibility Study (RI/FS) investigations some of which have lost structural integrity, are stored in a contained (bermed) area located in Area 2. Disposal of these materials are currently under discussion with EPA and will be implemented within a reasonable time.
   - Newer 55-gallon steel drums generated from WDIG's Predesign and Remedial Design (RD) investigations, which are in good condition, are expected to remain at the Site until their contents are disposed.

B.6.6 FACILITY DESCRIPTION

1. The Site encompasses approximately 40 acres, while the Subject Area of the Site is approximately 20 acres. Of the 20 acres, less than 15 percent is of an impervious nature (i.e., concrete foundation pads) the remaining portion is vacant (vegetation covered). Refer to Section 2.3 for a complete description of the facility.

B.6.7 SIGNIFICANT SPILLS

1. There have been no known spills or leaks of toxic or hazardous pollutants to the stormwater runoff in the Subject Area since the Site stopped receiving waste in the mid to late 1960s.

B.6.8 EXISTING SAMPLING DATA

1. Existing analytical data for stormwater samples collected at the Site is recorded in the Site database. The database is maintained by the WDIG Project Coordinator (Project Navigator Ltd.).

B.6.9 STORMWATER MANAGEMENT CONTROLS

B.6.9.1 STORMWATER POLLUTION PREVENTION PERSONNEL

1. The Project Coordinator for the Waste Disposal, Inc. Group (WDIG) and his designates are responsible for developing, implementing and revising the SWPPP.

B.6.9.2 PREVENTATIVE MAINTENANCE

1. Stormwater monitoring will be performed in the Subject Area by making visual observations during a significant storm event (greater than 2 inches of precipitation over a 24-hour period) of the five stormwater monitoring points (MP-1 through -5) shown in Figure 1.

2. Natural vegetation will be used to prevent surface erosion and help control surface water flow at the Site.

B.6.9.3 GOOD HOUSEKEEPING

1. Since there is generally no activity at the Site other than periodic investigative work, no formal housekeeping plan is necessary. There are provisions in the Site Security Plan to maintain fences, signage and provide Site Security. Investigation workplans for the Site include housekeeping practices such as sampling waste disposal procedures.

B.6.9.4 SPILL PREVENTION AND RESPONSE

1. The purged ground water and decontamination water contained in the two 6,000-gallon Baker Tanks plan to be discharged to the surface following approval from the EPA. There are no other materials at the Site that could cause a spill in the Subject Area.

B.6.9.5 ADDITIONAL STORMWATER MANAGEMENT PRACTICES

1. As discussed in Appendix A, the stormwater is sampled and analyzed to obtain approval from agencies (EPA, RWQCB and Santa Fe Springs Fire Department) prior to discharging the stored water to the storm drain shown in Figure 1.

2. Stormwater samples will be collected from all stormwater collection tanks on an as-needed basis (i.e., when tanks reach full storage capacity). Additionally, once during each rainy season one sample will be collected from each of the three locations, MP-1 to MP-3. Samples will be collected under the guidelines described in the Site SAP and QAPP. Laboratory analysis of the stormwater samples will include the following constituents: oil and grease, specific conductance, total suspended solids (TSS), metals (priority list), Total Organic Carbon (TOC), priority pollutants (EPA Method 8260), iron and pH. These constituents are identified in a letter from the EPA dated February 25, 1998, and from the SWRCB Industrial Activities Storm Water General Permit.

3. Analytical results will be submitted to the agencies noted above prior to discharging the stored water to the storm drain.

B.6.9.6 SEDIMENT AND EROSION PREVENTION

1. The Site is covered with natural vegetation which minimizes surface erosion from occurring at the Site.

B.6.9.7 EMPLOYEE TRAINING

1. WDIG subcontractors are routinely instructed in safe work practices and proper response procedures for various emergency situations during site investigation activities. Safe work practices and safety in general are stressed by WDIG in every activity. Proper safety

equipment, including personal protective equipment (PPE), is provided and required where appropriate. Field activities are performed under the Site Health and Safety Plan (TRC, October 2003).

B.6.9.8 INSPECTIONS

1. WDIG will perform a yearly visual Site inspection prior to the rainy season (September through May) of the Subject Area. In addition, visual inspections of the Subject Area will also be made during a precipitation event greater than 2 inches over a 24-hour period

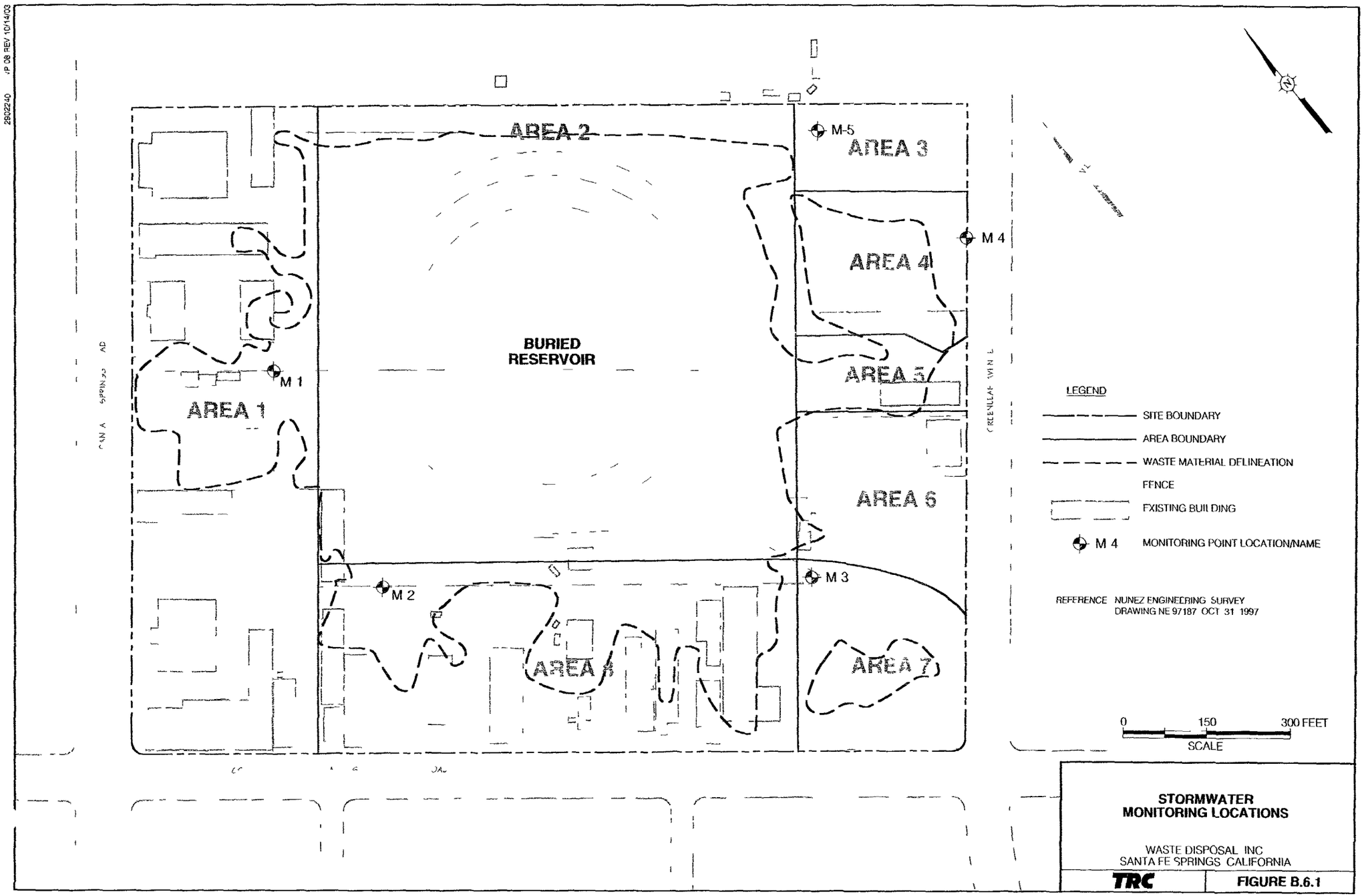
B.6.10 NONSTORMWATER DISCHARGES

1. No illicit connections or contributions to the stormwater discharge exist at the Site.

B.6.11 PRACTICES TO REDUCE POLLUTANTS ENTERING STORMWATER

1. Protection against stormwater runoff is provided by a stormwater collection system. Stormwater runoff is also conveyed at the Site through sheet flow and concentrated areas of surface flow.

2902240 JP 08 REV 10/14/03



STORMWATER MONITORING LOCATIONS

WASTE DISPOSAL INC
SANTA FE SPRINGS CALIFORNIA

TRC | **FIGURE B.6.1**